

UNITED STATES DEPARTMENT OF AGRICULTURE  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE  
WILDLIFE SERVICES



IN COOPERATION WITH

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOREST SERVICE



**ENVIRONMENTAL ASSESSMENT**

**ORAL VACCINATION TO CONTROL  
SPECIFIC RABIES VIRUS VARIANT IN RACCOONS  
ON NATIONAL FOREST SYSTEM LANDS  
IN THE UNITED STATES**

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## EXECUTIVE SUMMARY

This Environmental Assessment (EA) documents the analysis of the potential environmental effects of a proposal to expand the involvement of the U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service, Wildlife Services (APHIS-WS) program in oral rabies vaccination (ORV) programs to portions of National Forest System lands, excluding Wilderness Areas, in a number of states. The National Forest System lands (see Appendix H for a list of National Forests) where APHIS-WS involvement would be expanded may be located within the states of Maine, New York, Vermont, New Hampshire, Pennsylvania, Ohio, Virginia, West Virginia, Tennessee, Kentucky, Alabama, Georgia, Florida, North Carolina, South Carolina, Massachusetts, Maryland, and New Jersey. Currently, cooperative rabies surveillance activities and/or baiting programs are already being conducted on various land classes, with the exception of National Forest System lands, in many of the aforementioned states. The programs' primary goals are to stop the spread of a specific raccoon rabies variant or "strain" of the rabies virus. If not stopped, this strain could potentially spread to much broader areas of the U.S. and Canada and cause substantial increases in public and domestic animal health costs because of increased rabies exposures. Numerous National Forest System lands are located within current and potential ORV barrier zones. To effectively combat this strain of the rabies virus, it has become increasingly important to bait these large land masses.

The oral rabies vaccine used in these programs is the recombinant vaccinia-rabies glycoprotein (RABORAL V-RG®) vaccine currently licensed for use in raccoons and coyotes in the U.S. and Canada (although it is only being used for raccoons in Canada, as canine rabies has not been found in coyotes in Canada) and approved for experimental use in gray foxes in Texas. It has been used extensively and successfully in Europe to combat fox rabies. This vaccine is contained in baits which are distributed by aircraft and by ground placement and then are picked up and consumed by the target species. It has been found to be safe for use in a number of animal species.

The proposed action would involve use of federal funds by APHIS-WS to purchase ORV baits and cooperate with programs in the above states in the distribution of such baits over National Forest System lands to create zones of vaccinated target species that then serve as barriers to further advancement of this particular rabies virus variant. ORV baits could also be used in other areas where the raccoon rabies virus variant is known to occur with the goal of eliminating those variants from such areas. The proposed action would also include APHIS-WS assistance in monitoring and surveillance activities involving the capture and release or lethal collection of the targeted animal species in the above states to take biological samples for testing to determine the effectiveness of the ORV programs. APHIS-WS could also assist the states in implementing contingency plans that include the localized population reduction of the target species in areas where rabies outbreaks occur beyond ORV barriers. The role of the USDA-Forest Service (USFS) would involve cooperation with APHIS-WS in permitting access to National Forest System lands for bait disbursal and rabies monitoring and surveillance activities.

This EA analyzes a number of environmental issues or concerns with the oral rabies vaccine and with activities associated with ORV programs such as capturing and handling of animals for monitoring and surveillance purposes, as well as the potential implementation of contingency actions to address rabies outbreaks such as more concentrated localized ORV use or localized suppression of target species populations. The EA also analyzes several alternatives to the proposed action, including no action (i.e., no federal funding or participation by APHIS-WS on National Forest System lands), live-capture-vaccinate-release programs (trapping animals followed by administration of injectable vaccines and then release), and ORV bait distribution without animal specimen collections or localized lethal removal of target species under state contingency plans (i.e., no capturing or lethal removal of animals by APHIS-WS for monitoring or surveillance purposes or to address localized rabies outbreaks).

The analysis in this EA indicates no significant impacts on the quality of the human environment are expected from APHIS-WS expanded involvement in these programs.

## 1.0 CHAPTER 1: PURPOSE OF AND NEED FOR ACTION

### 1.1 BACKGROUND

Rabies is an acute, fatal viral disease of mammals most often transmitted through the bite of a rabid animal. The disease can be effectively prevented in humans and many domestic animal species, but abundant and widely distributed reservoirs among wild mammals complicate rabies control. Within most of the U.S., these reservoirs occur in geographically discrete regions where the virus transmission is primarily between members of the same species (Krebs et al. 2000). These species include but are not limited to raccoons (*Procyon lotor*), coyotes (*Canis latrans*), skunks (primarily *Mephitis mephitis*), gray foxes (*Urocyon cinereoargenteus*), and red foxes (*Vulpes vulpes*). Species specific variants of the virus may be transmitted to other animal species. However these encounters rarely result in sustained virus transmission within that animal species. Once established, virus transmission within a specific animal species can persist at epidemic levels for decades, even perhaps for centuries (Krebs et al. 2000).

The vast majority of rabies cases reported to the Centers for Disease Control and Prevention (CDC) each year occur in raccoons, skunks, and bats (Order *Chiroptera*). Red foxes account for less than 10% of the reported rabies cases, with domestic cats, dogs and cattle among those most often reported (CDC 2001a). Two canine rabies epizootics (epidemics in animals) emerged in Texas in 1988, one involving coyotes and dogs in South Texas and the other in gray foxes in West/Central Texas. The South Texas epizootic alone has resulted in two human deaths and caused over 3,000 people to receive postexposure rabies treatment (TDH 2001).

#### 1.1.1 Public Health Importance of Rabies.

Over the last 100 years, rabies in the United States has changed dramatically. About 90% or greater of all animal cases reported annually to CDC now occur in wildlife (Krebs et al. 2000; CDC 2001a). Before 1960 the majority of cases were reported in domestic animals. The principal rabies hosts today are wild carnivores and bats. The number of rabies-related human deaths in the U.S. has declined from more than 100 annually at the turn of the century to an average of one or two people/year in the 1990s. Modern day prophylaxis, which is the series of vaccine injections given to people who have been potentially or actually exposed, has proven nearly 100% successful in preventing mortality when administered promptly (CDC 2001a). In the U.S., human fatalities associated with rabies occur in people who fail to seek timely medical assistance, usually because they were unaware of their exposure to rabies.

Although human rabies deaths are rare, the estimated public health costs associated with disease detection, prevention, and control have risen, and are estimated to exceed \$300 to \$450 million annually. These costs include the vaccination of companion animals, maintenance of rabies laboratories, medical costs, such as those incurred for exposure case investigations, rabies post-exposure prophylaxis (PEP) and animal control programs (CDC 2001a).

Accurate estimates of these expenditures are not available. Although the number of PEPs given in the U.S. each year is unknown, it is estimated to be about 40,000. When rabies becomes epizootic or enzootic (i.e., present in an area over time but with a low case frequency) in a region, the number of PEPs in that area increases. Although the cost varies, a course of rabies immune globulin and five doses of vaccine given over a 4-week period typically exceeds \$1,000 (CDC 2001a) and has been reported to be as high as \$3,000 or more (Meltzer 1996). In Massachusetts during 1991-1995, the median cost for PEP was \$2,376 per person (CDC 2001b). Also, as epizootics spread in wildlife populations, the risk of "mass" human exposures requiring treatment of large numbers of people that contact individual rabid domestic animals infected by wild rabid animals increases – one case in Massachusetts involving contact with, or drinking milk from, a single rabid cow required PEPs for a total of 71 persons (CDC 2001b). The total cost of this single incident exceeded \$160,000 based on the median cost for PEPs in that state cited above. Perhaps the most expensive single mass exposure case on record in the U.S. occurred in 1994 when a kitten from a pet store in Concord, NH tested positive for rabies after a brief illness. As a result of potential exposure to this kitten or to other potentially rabid animals in the store, at least 665 persons received postexposure rabies



vaccinations at a total cost of more than \$1.1 million (Noah et al. 1995).

### 1.1.2 Raccoon Rabies in the Eastern U.S.

Rabies in raccoons was virtually unknown prior to the 1950s. It was first described in Florida and spread slowly during the next three decades into Georgia, Alabama, and South Carolina. It was unintentionally introduced into the mid-Atlantic states, probably by translocation of infected animals (Krebs et al. 1999). The first cases appeared in West Virginia and Virginia in 1977 and 1978. Since then, raccoon rabies in the area expanded to form the most intensive rabies outbreak in the U.S. The strain is now enzootic in all of the eastern coastal states, as well as Alabama, Pennsylvania, Vermont, West Virginia, and, most recently, parts of Ohio (Krebs et al. 2000). In the past 21 years, all of the mid-Atlantic and New England states have experienced at least one outbreak. The raccoon rabies epizootic front reached Maine in 1994, reflecting a movement rate of about 30 miles per year (48.3 km/yr) (Kemere et al. 2001). It was also first confirmed in northeastern Ohio in 1996 (Krebs et al. 1998). In 1999, the first three cases of raccoon rabies were confirmed in southern Ontario (Rosatte et al. 2001) and the strain has recently been reported in New Brunswick.

Raccoon rabies presents a human health threat through potential direct exposure to rabid raccoons, or indirectly through the exposure of a pet that had an encounter with a rabid raccoon. To date, one case resulting in the death of a human is attributable to the raccoon strain of the rabies virus. A 25-year-old, previously healthy northern Virginia man died in June 2003. A diagnosis of rabies had not been considered and was only made 3 months after death when brain tissue was examined. Patient history did not reveal contact with animals and no specific exposure experience could be determined (S. Jenkins, Virginia Department of Health, pers. comm. 2003, L. Orciari, CDC, pers. comm. 2003). Adding to the threat of the raccoon strain of the rabies virus are the number of pets and livestock examined and vaccinated for rabies, the number of diagnostic tests requested, and the number of post exposure treatments which are all greater when raccoon rabies is present in an area. Human and financial resources allocated to rabies-related human and animal health needs also increase, often at the expense of other important activities and services.

The westward movement of the raccoon rabies front has slowed, probably in response to both natural geographic and man-made barriers. The Appalachian Mountains and perhaps river systems flowing eastward have helped confine the raccoon variant to the eastern U.S. In northeast Ohio, an oral rabies vaccination (ORV) program has established an "immune barrier" along its border with Pennsylvania from Lake Erie to the Ohio River near East Liverpool, Ohio that has slowed if not stopped the westward expansion of raccoon rabies. If raccoon rabies breaches this barrier, current live trapping results in Ohio (A. Montoney, APHIS-WS, pers. comm. cited in Kemere et al. 2001) as well as the status of raccoons in the Midwest (Sanderson and Hubert 1982, Glueck et al. 1988, Hasbrouck et al. 1992, Mosillo et al. 1999) suggest that raccoon populations are sufficient for rabies to spread westward along a front at a rate similar to or greater (Rupprecht and Smith 1994) than the rate at which this rabies strain has spread in the eastern U.S. Figure 1-1 shows the potential for spread of this rabies variant across the central portion of the U.S. if it is not stopped.

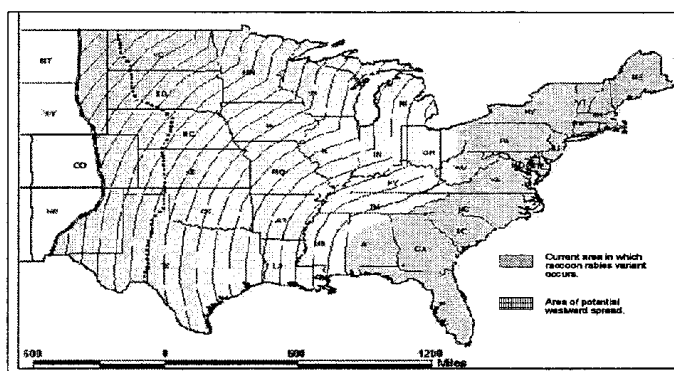


Figure 1-1. Potential areas of the U.S. into which raccoon rabies could spread if not stopped by rabies management programs. From Kemere et al. (2001).

### 1.1.3 Primary Need for Action.

People are concerned with potential health threats and costs associated with being exposed to a rabid animal. People are most often exposed through a bite from a wild or domestic animal infected with the disease (CDC 2001a). More than 90% of all reported animal cases occur in wild animals (CDC 2001a). Rabies is a fatal disease in humans unless medically treated with postexposure prophylaxis. Human health care concerns associated with the disease would be expected to increase as the rabies virus infects a much broader geographic area. Expansion of ORV activities to include National Forest System lands is important for providing adequate coverage to the barrier and other outbreak areas in order to retain program effectiveness.

In the area that stretches west from the leading edge of the current distribution of raccoon rabies (which stretches from Alabama northeastward along the Appalachian Mountains through coastal Maine) to the Rocky Mountains, there are more than 111 million livestock animals, including cattle, horses, mules, swine, goats, and sheep, valued at \$42 billion (65 FR 76606-76607, December 7, 2000). Also within this area are countless numbers of domestic animals that are kept by people as pets (cats, dogs, rabbits, ferrets, etc). If raccoon rabies were to spread into the above described area, many of these domestic animals would be at risk of being exposed to this specific variant.

### 1.1.4 Development of Oral Rabies Vaccination Programs.

Although the concept of ORV to control rabies in free-ranging wildlife populations originated in the U.S. (Baer 1988), it has a longer history of implementation in Europe and Canada. The emergence of raccoon rabies in the U.S. during the 1970s heightened interest in the application of ORV to raccoons. Due to biological and ecological differences among the types of animals that transmit rabies, development of specific vaccine and bait combinations was needed. One of the main difficulties was the development of a safe and effective vaccine for raccoons. In contrast to red foxes, which were the primary subjects of ORV programs in Europe and Canada, raccoons were not readily immunized by the oral route with the modified live rabies virus vaccines that worked well in foxes (Rupprecht et al. 1988). Additionally, modified "live virus" vaccines pose a small risk of causing vaccine-induced rabies, and have resulted in some cases of vaccine-induced rabies in animals (but no cases in humans) during oral baiting programs in Europe and Canada (Wandeler 1991). However, vaccinia-rabies glycoprotein (V-RG) vaccine has proven to be orally effective in raccoons, coyotes and foxes. This vaccine was extensively evaluated in the laboratory for safety in more than 50 vertebrate species with no adverse effects regardless of route or dose. As a consequence of field safety testing in the early 1990's, V-RG was conditionally licensed in 1995 and fully licensed in 1997 in the U.S. for vaccination of free-ranging raccoons. It remains the only effective vaccine licensed for use in the U.S. and Canada for raccoons.

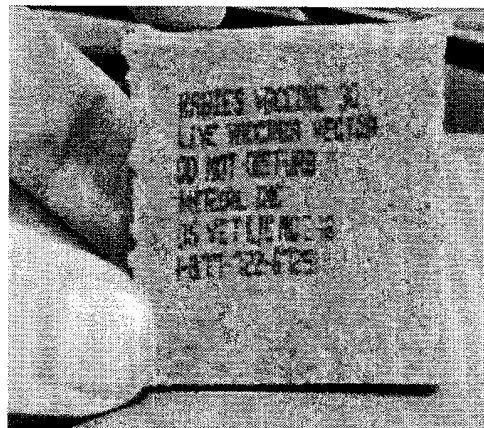
The vaccinia-rabies glycoprotein vaccine is commercially available from \_\_\_\_\_ under the registered name RABORAL V-RG®. It is currently the only licensed oral vaccine available for rabies control in some wild carnivores in the U.S. (CDC 2000). Throughout the remainder of this document, RABORAL V-RG® is referred to as "V-RG". As a recombinant vaccine, the letter "V" is used to denote vaccinia, the self-replicating pox virus that serves as the vector (i.e., carrier) for the rabies virus gene that is responsible for the production of rabies glycoprotein. The letters "RG" stand for rabies glycoprotein which is the protective sheath around the bullet-shaped rabies virus core. The glycoprotein by itself is noninfective and cannot cause rabies, but it serves as an "antigen" which means it elicits an immune response to rabies when the vaccine is swallowed by raccoons. There is no possibility of vaccine-induced rabies with V-RG because the vaccine only contains the non-infective surface protein of the rabies virus; none of the viral nuclear material (i.e., RNA), which would be required for the rabies virus to replicate, is present in the vaccine. Over 51 million doses<sup>1</sup> have been distributed in the U.S. since 1990 with only one case of vaccinia virus infection reported in humans (resulting in localized skin rashes) to date

<sup>1</sup> Numbers of baits disbursed over time may differ throughout the document depending on whether the number involves total ORV baits dropped in the U.S. or baits dropped during APHIS-WS involvement.

(Rupprecht et al. *unpublished* 2001, Rupprecht et al. 2001). This vaccine has been tested in more than 50 wild mammalian and avian species without adverse effects. Additionally, a domestic animal's annual rabies vaccination can be safely administered even if it recently ingested a dose of oral rabies vaccine.

A number of studies have been conducted to determine the best bait formulations and strategies for delivery of ORV vaccines to raccoons (Hanlon et al. 1989a, Hable et al. 1992, Hadidian et al. 1989, Linhart et al. 1991, Linhart et al. 1994). When raccoons eat oral rabies baits and puncture a sachet<sup>2</sup> containing the vaccine, the vaccine is swallowed and bathes the lymphatic tissue in the throat area and initiates the immunization process. A positive rabies antibody titer in an animal from a baited area is most likely due to consumption of a bait and adequate contact with vaccine. However, the lack of a detectable antibody response may not be an accurate reflection of immune status. It is possible that the animal was successfully immunized, but that the blood sample was taken earlier or later than when antibodies could be detected (C. Hanlon, CDC, pers. comm. 2003).

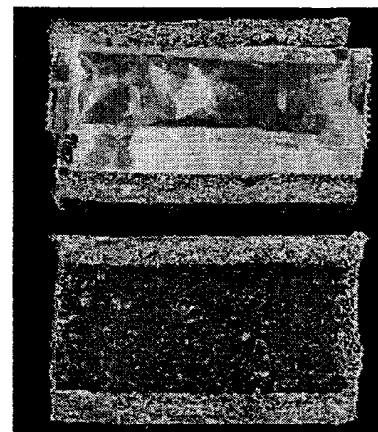
Antibodies induced by a one-time oral vaccination appear to be of relatively short duration. Among a group of animals in a baited area, the best time to collect blood samples for detection of antibodies is 3-8 weeks after baiting. A successfully immunized animal may have antibodies shortly after vaccination, but then the level may decline to undetectable levels. If the animal is then exposed to rabies, it is still likely that the animal's "memory" immunity will become activated by the rabies exposure and more antibodies will be made very quickly. The successfully immunized animal will most likely survive exposure, even though it did not have measurable antibodies at the time of the exposure (C. Hanlon, CDC, pers. comm. 2003).



**Figure 1-2. Fishmeal polymer block oral rabies vaccine bait showing warning label and toll-free telephone number to call for information (photo by K. Nelson, APHIS-WS, Vermont).**

The baits are small blocks of fishmeal that are held together with a polymer binding agent and are considered to be "food grade" materials (Figure 1-2). The baits are rectangular or square in shape with hollow centers. The sachet containing the liquid vaccine is contained in the hollow center of the bait (Figure 1-3). "Coated" sachets with a simple fishmeal attractant coating have also been field tested with effectiveness that appears to be comparable to fishmeal polymer baits containing the sachet (Linhart et al. *unpublished* 2001). Using the "coated" sachet may be equal in effectiveness at lower cost per vaccinated target wild animal. All baits are marked with a warning label that includes a phone number to call for additional information.

The bait may contain a tetracycline biomarker. These biomarkers bind to calcium, which can be found in the metabolically active portions of bones and teeth of animals. Tetracycline deposits can be viewed in the teeth or bones with fluorescent light under a microscope. When the tooth or bone sample of an animal is positive for tetracycline, it is likely that the animal has eaten at least one bait and possibly multiple baits (C. Hanlon, CDC, pers. comm. 2003).



**Figure 1-3. Fishmeal polymer block oral rabies vaccination bait broken open to show the sachet containing the vaccine liquid.**

<sup>2</sup> The sachet is a thin plastic packet much like those in which condiments (e.g., catsup, mustard) are provided at fast food restaurants.

Other potential sources of "background" tetracycline in a study area may include consumption of medicated feeds such as those sometimes used for production animals, intentional treatment by humans with tetracycline, and non-specific fluorescence from undescribed but similar chemical compounds that may be found naturally (C. Hanlon, CDC, pers. comm. 2003).

In field tests conducted in the U.S., the majority of ORV baits have been consumed within the first 7 to 14 days after placement, with reports of up to 100% of the baits being consumed within a 7 day period (Farry et al. 1998b, Hable et al. 1992, Hadidian et al. 1989, Hanlon et al. 1989a, Linhart et al. 1994, Steelman et al. 2000; USDA 1995a). The likelihood of a bait being consumed is dependent upon several factors including animal population densities (target and nontarget species), bait preference, and the availability of alternative food sources. Those baits that are not consumed may remain in the environment for several months after placement dependent upon environmental conditions (precipitation, temperature, etc.) and the condition of the baits. The V-RG virus that is not consumed by the target species or other vertebrates will become inactivated over a relatively short time period. Persistence and stability of the V-RG virus outside of an organism is highly dependent on ambient temperature and local environmental conditions, the higher the temperature, the quicker the virus will become inactive (USDA 1992; USDA 1995a). For example, at temperatures between 68 and 100 degrees Fahrenheit the liquid viral vaccine potency remains stable for approximately 14 to 7 days, respectively, in the un-punctured sachet or inside the bait. In situations where the bait and sachet are damaged inactivation of the V-RG virus will occur more rapidly.

Oral wildlife vaccination for raccoon rabies control has been under field evaluation in the U.S. since 1990. A limited field release of the recombinant vaccine occurred on Parramore Island, VA, prior to wider spread use in the U.S. for control of raccoon rabies (Hanlon et al. 1998). A major objective of this field trial was to evaluate the free-ranging raccoon population for adverse effects after the distribution of V-RG vaccine-laden baits. With the development and field testing of the V-RG vaccine, a potential method of rabies control now exists for some rabies variants to complement methods of control which include public education, domestic animal vaccination, and human PEP.

Since the first field release of the V-RG vaccine in 1990, the number of vaccine-laden baits that were distributed annually in the U.S. rose exponentially to a total of over 800,000 by 1997. Thirteen subsequent field projects have been conducted or are in progress in the eastern U.S. and Texas (USDA 2002b). Several of these projects have been conducted to evaluate the effect of oral vaccination on raccoon rabies. Since ORV program inception, positive rabies cases have either decreased or the advance of the virus has been slowed or stopped in each state where an ORV program was initiated:

- In Maryland, 18 rabies cases were reported per year on the Annapolis Peninsula alone before the ORV program began in 1998 and by 2000 and 2001, zero cases were reported.
- In New York, an ORV program was implemented in 1998 to prevent the northward spread of the virus. Prior to the ORV program, 148 positive rabies cases were recorded in New York in 1998 and in 2001 a decline to 3 positive cases was recorded. A recently completed project in Albany and Rensselaer Counties of New York State demonstrated that raccoon rabies may be virtually eliminated from an area where the disease had been present for a number of years by use of ORV.
- In Ohio, 62 positive rabies cases were recorded prior to program implementation in 1997. In FY 2001, zero cases were reported. Additionally, in Ohio, along the Pennsylvania border from Lake Erie to West Virginia, twice yearly baiting has been successful to date in preventing the westward spread of raccoon rabies (K. Smith, pers. comm. 2001).
- In Massachusetts, the rabies virus has not spread to the Cape where intensive baiting programs at the peninsular neck (since 1995), combined with the natural barrier of Cape Cod Canal, appear to have acted as effective barriers (Robbins et al. 1998)
- In Vermont, before the program was started in 1996, positive rabies cases were found 73 km. south of

the Canada border. With an annual rate of spread of rabies at about 30 miles/year (Kemere et al. 2001), positive raccoon strain rabies cases should have reached the Canada border as early as 1999. However, the border has not yet been breached. Annual vaccination projects in the Lake Champlain Valley in Vermont and New York have shown promise in preventing the northward spread of raccoon rabies. Raccoon rabies has moved through much of the St. Lawrence River Valley in northern New York with the appearance of two raccoon rabies foci (i.e., point locations of rabies cases) in southern Ontario. Cooperative efforts with Ontario and the implementation of point infection control strategies in Ontario around these foci are under evaluation to determine if the raccoon variant of the rabies virus can be contained and eliminated (L. Bigler, pers. comm. 2001).

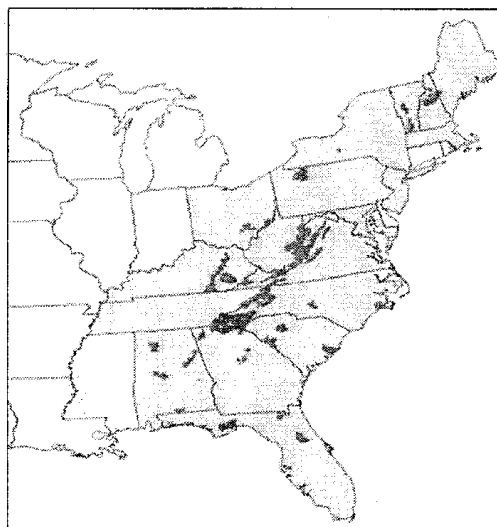
- Projects have also been conducted or are in progress in New Jersey (1992-1994, with additional projects reinitiated in the last couple of years), Florida (1995-present), Virginia (2000-present), West Virginia (2001-present), Pennsylvania (1995-present), Tennessee (2001 to present), and Texas (1995 to present).

## 1.2 DESCRIPTION OF THE PROPOSED ACTION

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service-Wildlife Services (APHIS-WS), in cooperation with the USDA-Forest Service (USFS), proposes to expand the ORV program to portions of National Forest System lands, excluding Wilderness Areas, in a number of states where raccoon rabies outbreaks occur or have the potential to occur. The National Forest System lands (see Appendix H for a list of National Forests) where APHIS-WS involvement could be expanded are within the states of Maine, New York, Vermont, New Hampshire, Pennsylvania, Ohio, Virginia, West Virginia, Tennessee, Kentucky, Alabama, Georgia, Florida, North Carolina, South Carolina, Massachusetts, Maryland, and New Jersey. Figure 1-4 shows the states and National Forest System lands where ORV activities could occur. Potential areas involved may cover several land types and land uses, including: forests, meadows, wetlands, and rangelands representing diverse wildlife habitats. Free water bodies, such as lakes, rivers, and oceans, would not be baited (see Section 2.2.6).

The program would involve use of APHIS-WS federal funds to purchase and distribute ORV baits to create zones of vaccinated target species that would then serve as barriers to cease the further advancement of raccoon rabies virus variants. Vaccination zones would be determined in cooperation with the various state rabies task forces, state health or agriculture departments, and/or other agencies with jurisdiction over vaccine use and application in wildlife and domestic animal species. ORV baits could also be used in other areas where the raccoon rabies virus variant is known to occur with the goal of eliminating those variants from such areas. The proposed action would also include APHIS-WS assistance in monitoring and surveillance activities involving the capture and release or lethal collection of the targeted animal species in the above states to take biological samples for testing to determine the effectiveness of the ORV programs. APHIS-WS could also assist the states in implementing contingency plans that include the localized population reduction of the target species in areas where rabies outbreaks occur beyond ORV barriers. The role of the USFS would involve cooperation with APHIS-WS in permitting access to National Forest System lands for bait disbursal and rabies monitoring and surveillance activities.

A portion of APHIS-WS federal funds would be used to: 1) purchase ORV baits and participate in the distribution of ORV baits by air and ground placement on National Forest System lands within the ORV barrier zone; 2) provide other forms of assistance in monitoring



**Figure 1-4. National Forest System lands (green) within respective states (yellow) in which APHIS-WS is proposing to expand assistance to and participation in ORV programs. See also Appendix H for a listing of National Forest units in program area.**

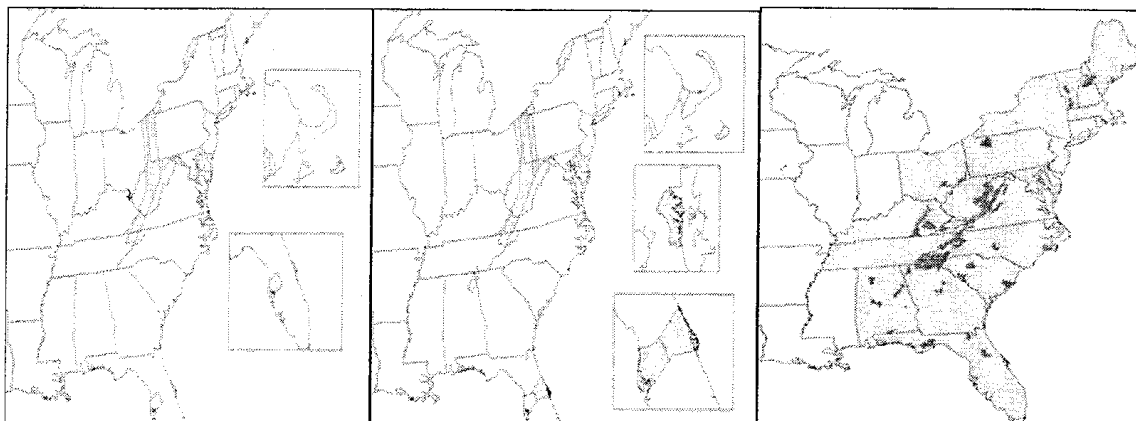
rabies and determining the effectiveness of the ORV programs through collection and testing of samples from wild animal specimens on National Forest System lands; and, 3) if necessary, participate in implementing contingency plans on National Forest System lands that may involve the localized reduction of target species populations through lethal means (coordination with specific National Forests would occur prior to project implementation).

The ORV that would be used is the V-RG vaccine which is placed in two different types of baits as described in Section 1.1.4. The individual baits may also contain a biomarker (e.g., tetracycline, iophenoxic acid). The purpose of the biomarker is to aid in determining whether animals collected for monitoring purposes have eaten one or more baits. The effectiveness of the vaccine can be assessed by determining the proportion of animals that have eaten baits that have also been successfully vaccinated against rabies.

The intent of the bait distribution is to orally vaccinate wild raccoons on National Forest System lands in portions of the above states. Currently, cooperative rabies surveillance activities and/or baiting programs are already being conducted on various land classes, with the exception of National Forest System lands, in many of the aforementioned states. Therefore, the primary goals of this program are to include National Forest System lands in attempt to: 1) stop the forward advance of this strain of rabies from areas where it now occurs by immunizing portions of target species populations along the leading edges of the rabies fronts; and 2) reduce the incidence of rabies cases involving wild and domestic animals and rabies exposures to humans in the areas where the ORV programs are conducted. If the ORV program is successful in stopping the forward advance of this strain, then the ultimate goal could include elimination of this rabies variant.

The areas in which the ORV baits would be distributed and from which animal specimens would be collected could be anywhere on National Forest System lands, excluding Wilderness Areas, in some or all of the above listed states. National Forest System lands proposed for inclusion in this ORV program are listed in Appendix H. Coordination with specific National Forests would occur prior to project implementation to ensure that the integrity of specially designated areas is maintained (i.e., Research Natural Areas, Wild and Scenic Rivers, etc.). The ORV zones would be delineated based on the most current distribution of rabies cases and the expected direction of disease spread. Vaccination zones would be determined in cooperation with state rabies task forces, state health departments, and/or other state agencies with jurisdiction over vaccine use and application in wildlife and domestic animal species. Figures 1-5 A, B, and C show the current areas anticipated to be treated or to continue treatment with ORV baits in the involved states and on National Forest System lands. Pending the verification of legal authorities to do so, ORV baits would be distributed by the states over a variety of National Forest System lands. Each individual bait would have a warning label advising persons not to handle or disturb the bait along with a toll-free telephone number to call for further information.

Wild animal collections for purposes of monitoring would be conducted using a variety of live capture or lethal methods. Information from raccoons would be predominantly collected from cage-trapped individuals that, if apparently healthy, would normally be released at or near their site of capture. Only legally approved methods would be used in all animal sample collection areas to provide critical data for the evaluation of project effectiveness. Project effectiveness would be based in large part on the percentage of ORV baits consumed in populations of target species, the presence of sufficient levels of serum neutralizing antibodies in a large enough percentage of the population to resist the spread of rabies, and the absence of the rabies strain targeted for control with ORV beyond the vaccination barrier established to prevent spread of the virus.



**Figures 1-5 A, B, and C. A (Left): Current ORV barrier zones in the U.S. B (Center): Examples of anticipated ORV barrier zones where APHIS-WS would continue or expand participation in and assistance to ORV programs to stop the westward spread of raccoon rabies. C (Right): ORV baits would be distributed on National Forest System lands (green) within these and perhaps other zones under the proposed action to vaccinate wild raccoons and form barriers to halt further spread of the disease.**

In the event that the targeted rabies strain advances beyond the barriers created by the ORV zones, contingency plans may be implemented by the involved states that could include local population reduction of the target wildlife species using lethal means combined with the distribution of higher densities of ORV baits in and around such areas. Any localized lethal population reduction efforts that would occur would likely be integrated with hand or aerial placement of ORV baits in and around the population reduction area to restore the integrity of the ORV barrier and prevent further spread of rabies. APHIS-WS may, as part of the proposed action, assist in such efforts by providing funds, personnel, or equipment to capture and kill target species. Should this occur, methods used would involve any of those described above for the collection of wild animal specimens. The need for APHIS-WS involvement in contingency plans that employ localized lethal population suppression of raccoons is considered to be unlikely.

### 1.3 AUTHORITIES

#### 1.3.1 Federal Authorities.

**Act of March 2, 1931 (7 U.S.C. 426-426b and 426c).** APHIS-WS is authorized to conduct programs to address wildlife-caused disease problems, including the suppression of rabies in wildlife, by the Act of March 2, 1931, as amended.

**7 U.S.C. Sec. 147b.** This law authorizes the Secretary of Agriculture, in connection with emergencies which threaten any segment of the agricultural production industry of the U.S., to transfer from other appropriations or funds available to the agencies or corporations of USDA such sums as the Secretary may deem necessary, to be available only in such emergencies for the arrest and eradication of contagious or infectious diseases of animals. It is under this authority that funds from the federal Commodity Credit Corporation have been transferred to APHIS-WS to expend for the continuation and expansion of ORV programs in the states identified herein (65 FR 76606-76607, December 7, 2000).

**National Forest Management Act of 1976 (16 U.S.C. section 1600 [note]).** This law amended the Forest and Rangeland Renewable Resources Planning Act of 1974, which called for the management of renewable resources on National Forest lands. The National Forest Management Act requires the Secretary of Agriculture to assess forest lands, develop a management program based on multiple-use, sustained-yield principles, and implement a resource management plan for each unit of the National Forest System. This Act is the primary statute governing the administration of National Forests.

**Cooperative Forestry Assistance Act of 1978 (16 U.S.C. section 2101 [note]).** This law authorizes the

Secretary of Agriculture to assist in controlling forest insects and diseases directly on National Forest System lands and in cooperation on other federal and non-federal lands of all ownerships.

**Virus-Serum-Toxin Act (21 U.S.C. 151 et seq.).** The Virus-Serum-Toxin Act (VSTA) became law in 1913 and was amended in 1985. The VSTA regulates the preparation and sale of biologic products used in animals. The oral rabies vaccine (RABORAL V-RG®) is licensed for treatment of raccoons and coyotes by the USDA under this Act. Animal vaccines shipped in or from the U.S. must be prepared under a USDA license. Animal vaccines may not be imported without a USDA license. Federal regulations implementing the VSTA (9 CFR 103.3) require authorization by APHIS before an experimental biological product can be shipped for the purpose of treating limited numbers of animals as part of an evaluation process. The license for RABORAL V-RG® requires that it be restricted for use in state or federal rabies control programs.

**Public Health Service Act.** The CDC, located in Atlanta, Georgia, is an agency of the U.S. Department of Health & Human Services. CDC's mission is to promote health and quality of life by preventing and controlling disease, injury, and disability. CDC is authorized under 42 U.S.C. 241 to render assistance to other appropriate public authorities in the conduct of research, investigations, demonstrations, and studies relating to the causes, diagnosis, treatment, control, and prevention of physical and mental diseases and impairments of man. Additionally, under 42 U.S.C. 243(a), the Secretary of Health & Human Services, may assist states and their political subdivisions in the prevention and suppression of communicable diseases.

### 1.3.2 State and Local Authorities.

Each of the states involved in this proposed action has a state agency or agencies with authority under state law to approve, conduct or coordinate rabies control programs. APHIS-WS involvement in rabies control in each state has previously occurred and, under the proposed action, would only occur in complete cooperation with the appropriate state agency(ies) and in accordance with state authorities as identified by those agencies.

With regard to ORV programs, it is the various cooperating states that exercise their authorities under state law to propose or approve the distribution of ORV baits onto lands owned or managed by a variety of entities including private persons, federal land management agencies (e.g., USFS, National Park Service, and others), state, county, and city governments, and American Indian Tribes. It is critical to the success of establishing and maintaining ORV barriers and, potentially, to the eventual elimination of the targeted rabies strain in many areas, that all lands containing substantial amounts of habitat for the targeted carnivore species be included. APHIS-WS would not be making the decision to distribute baits on the various land ownerships. Those decisions would be made by the states. The proposed action assumes that ORV baits would be distributed under state authorities, consistent with pertinent property rights, laws, and regulations and would include acquiring permission from public land managers and American Indian Tribes when appropriate.

## 1.4 OTHER RELEVANT FEDERAL LAWS AND REGULATIONS

**National Environmental Policy Act of 1969, as amended (NEPA) (42 U.S.C. 4321 et seq.).** The purpose of the National Environmental Policy Act is to declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality.

APHIS-WS prepares analyses of the environmental impacts of program activities to meet procedural requirements of this law. APHIS has previously prepared a number of environmental assessments (EAs) to address the environmental effects of experimental programs using V-RG ORV baits and covering the approval of licensing of the vaccine for use in raccoons (see Section 1.5). APHIS-WS also completed an EA (USDA 2001) and Finding of



No Significant Impact (FONSI), dated July 30, 2001; a supplemental FONSI (USDA 2002a), dated August 5, 2002; and a supplemental EA (USDA 2003a) and FONSI, dated June 12, 2003. These documents analyzed the environmental effects of APHIS-WS involvement in the funding of and participation in ORV programs to eliminate or stop the spread of raccoon rabies in a number of eastern states (New York, Ohio, Vermont, New Hampshire, West Virginia, Virginia, Pennsylvania, Florida, Massachusetts, Maryland, New Jersey, Alabama, Tennessee, Kentucky, Maine, and Georgia) and gray fox and coyote rabies in Texas. APHIS-WS determined the action would not have any significant impact on the quality of the human environment (see Section 1.5).

**Endangered Species Act (ESA) (16 U.S.C. 1531 et seq.).** It is federal policy, under the ESA, that all federal agencies shall seek to conserve threatened and endangered (T&E) species and shall utilize their authorities in furtherance of the purposes of the Act (Sec.2(c)). For actions that "may affect" listed species, APHIS-WS conducts Section 7 consultations with the U.S. Fish & Wildlife Service (USFWS) to ensure that *"any action authorized, funded or carried out by such an agency . . . is not likely to jeopardize the continued existence of any endangered or threatened species . . . Each agency shall use the best scientific and commercial data available"* (Sec.7(a)(2)). APHIS-WS has analyzed the potential for effects on listed species in this EA and has concluded that the proposed action would not affect any listed species (see Section 4.1.3).

**National Historical Preservation Act (NHPA) of 1966 as amended (16 U.S.C. 470).** The NHPA and its Implementing regulations (36 CFR 800) require federal agencies to: 1) determine whether activities they propose constitute "undertakings" that can result in changes in the character or use of historic properties and, 2) if so, to evaluate the effects of such undertakings on such historic resources and consult with the State Historic Preservation Office regarding the value and management of specific cultural, archaeological and historic resources, and 3) consult with appropriate American Indian tribes to determine whether they have concerns for traditional cultural properties in areas of these federal undertakings.

ORV activities described under the proposed action (Section 1.2) do not cause major ground disturbance, do not cause any physical destruction or damage to property, do not cause any alterations of property, wildlife habitat, or landscapes, and do not involve the sale, lease, or transfer of ownership of any property. In general, such methods also do not have the potential to introduce visual, atmospheric, or audible elements to areas in which they are used that could result in effects on the character or use of historic properties. Therefore, the methods that would be used under the proposed action are not generally the types of activities that would have the potential to affect historic properties. If an individual activity with the potential to affect historic resources is planned under an alternative selected as a result of a decision on this EA, then site-specific consultation as required by Section 106 of the NHPA would be conducted as necessary.

**Federal Food, Drug, and Cosmetic Act (21 U.S.C. 360).** This law places administration of pharmaceutical drugs, including those used in wildlife capture and handling, under the Food and Drug Administration.

**Controlled Substances Act of 1970 (21 U.S.C. 821 et seq.).** This law requires an individual or agency to have a special registration number from the federal Drug Enforcement Administration (DEA) to possess controlled substances, including those that are used in wildlife capture and handling.

**Animal Medicinal Drug Use Clarification Act of 1994 (AMDUCA).** The AMDUCA and its implementing regulations (21 CFR Part 530) establish several requirements for the use of animal drugs, including those used to capture and handle wildlife in rabies management programs. Those requirements are: (1) a valid "veterinarian-client-patient" relationship, (2) well defined record keeping, (3) a withdrawal period for animals that have been administered drugs, and (4) identification of animals. A veterinarian, either on staff or on an advisory basis, would be involved in the oversight of the use of animal capture and handling drugs under the proposed action. Veterinary authorities in each state have the discretion under this law to establish withdrawal times (i.e., a period of time after a drug is administered that must lapse before an animal may be used for food) for specific drugs. Animals that might be consumed by a human within the withdrawal period must be identified; the Western Wildlife Health Committee of the Western Association of Fish and Wildlife Agencies has recommended that suitable identification markers include durable ear tags, neck collars, or other external markers that provide unique identification (WWHC *undated*). APHIS-WS establishes procedures in each state for administering drugs used in wildlife capture and handling that must be approved by state veterinary authorities in order to comply with this law.

**Wilderness Act of 1964 – An Act (Public Law 88-577; 88<sup>th</sup> Congress, S.4; September 3, 1964).** The Wilderness Act allows federally owned lands meeting specific criteria to be designated as “wilderness areas.” The act prohibits and restricts certain uses of these designated lands. The act provides special provisions to allow certain activities to take place within designated wilderness areas such as the use of aircraft to control fire, insects and diseases (Sec. 4 (d)).

**Clean Air Act of 1970 as amended (42 U.S.C. 7401).** The Clean Air Act is a comprehensive federal law that regulates air emissions from area, stationary, and mobile sources.

## 1.5 RELATIONSHIP TO OTHER ENVIRONMENTAL DOCUMENTS

**Work Plan for Oral Vaccination by Ground or Aerial Baiting to Control Specific Rabies Virus Variant in Raccoons on National Forest System Lands in USFS Regions 8 and 9.** This Work Plan has been prepared by APHIS-WS in coordination with the USFS to implement ORV program activities on National Forest System lands in USFS Regions 8 and 9.

The USFS has reviewed the proposed action and alternatives described in this EA and has determined the proposed action is consistent with Land and Resource Management Plans for the National Forests listed in Appendix H and excluding Wilderness Areas.

A number of other NEPA documents have been prepared that analyzed the potential environmental effects of ORV programs and the methods used in rabies monitoring and surveillance. Pertinent information from those analyses has been incorporated by reference into this EA.

**Wildlife Services Programmatic EIS.** APHIS-WS has issued a final Environmental Impact Statement (EIS) (USDA 1997j) and Record of Decision on the National APHIS-WS program.

**EA and Finding of No Significant Impact – Oral Vaccination to Control Specific Rabies Virus Variants in Raccoons, Gray Foxes, and Coyotes in the United States.** This EA (USDA 2001) and FONSI, dated July 30, 2001; supplemental Decision/FONSI, dated August 5, 2002 (USDA 2002a); and supplemental EA and FONSI, dated June 12, 2003 (USDA 2003a), analyzed the environmental effects of APHIS-WS involvement in the funding of and participation in ORV programs to eliminate or stop the spread of raccoon rabies in a number of eastern states (New York, Ohio, Vermont, New Hampshire, West Virginia, Virginia, Pennsylvania, Florida, Massachusetts, Maryland, New Jersey, Alabama, Tennessee, Kentucky, Maine, and Georgia) and gray fox and coyote rabies in Texas. APHIS-WS determined the action would not have any significant impact on the quality of the human environment.

**EA and Finding of No Significant Impact – Proposed Issuance of a Conditional United States Veterinary Biological Product License to Rhone Merieux, Inc., for Rabies Vaccine, Live Vaccinia Vector.** This EA and its FONSI dated April 7, 1995, was prepared by APHIS and concluded there would be no significant impact on the quality of the human environment from the decision to issue the conditional license referred to above (USDA 1995a). The conditional license approved the use of V-RG in raccoon rabies control programs administered under the direction of state or federal government agencies. Mitigative measures required under the decision included public education and notification efforts prior to distributing the baits, and the placement of warning labels on each vaccine-laden bait.

**EA and Finding of No Significant Impact – Proposed Field Application of an Experimental Rabies Vaccine, Live Vaccinia Vector, in South Texas.** This EA and its Decision/FONSI completed in 1995 analyzed the environmental effects of experimental distribution of ORV baits containing V-RG to eliminate and stop the spread of coyote rabies in South Texas (USDA 1995b). APHIS determined the action would not have any significant impact on the quality of the human environment.

**EAs and Findings of No Significant Impact on proposed field trials/tests of live experimental vaccinia-vector**

**recombinant rabies vaccine for raccoons.** APHIS analyzed the potential environmental impacts of six separate field trials or tests of the recombinant V-RG vaccine in several northeastern states. In EAs and Decisions/FONSI's covering those actions, (USDA 1991, 1992, 1993, 1994a, 1994b, 1994c), APHIS determined that none of the actions would have any significant impact on the quality of the human environment.

**Risk Analyses for ORV using the V-RG recombinant virus.** Two formal risk analyses on the rabies vaccine -- live vaccinia vector (i.e., the recombinant V-RG vaccine) have been prepared previously by APHIS (USDA *undated a*, *undated b*). Both analyses concluded the risk of adverse animal safety, human safety, or other environmental effects to be low.

## 1.6 EXECUTIVE ORDER ON ENVIRONMENTAL JUSTICE

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations requires federal agencies to analyze disproportionately high and adverse environmental effects of proposed actions on minority and low-income populations. APHIS-WS has analyzed the effects of the proposed action and determined that implementation would not have adverse human health or environmental impacts on low-income or minority populations.

## 1.7 EXECUTIVE ORDER ON PROTECTION OF CHILDREN FROM ENVIRONMENTAL HEALTH AND SAFETY RISKS

Executive Order 13045 was passed to help protect children who may suffer disproportionately from environmental health and safety risks for many reasons. ORV activities as proposed in this EA would only involve legally available and approved methods that have been subjected to safety evaluations and testing. The vaccinia virus used as a carrier of the rabies glycoprotein is the same type of virus that was used in smallpox eradication, although more attenuated or weakened (USDA 1991, p. 39). The analysis in Section 4.1.1 of this EA supports a conclusion of very low to no risk of adverse effects on children from the ORV baiting strategy. Implementation of the proposed action would not increase environmental health or safety risks to children, but would in fact reduce such risks by minimizing the potential for children to contract rabies. Children are particularly at risk from rabies because they are more prone to experiencing "undetected" or "unappreciated" exposures (Huntley et al. *unpublished* 1996) that do not lead to post-exposure vaccine treatments. Therefore, federal involvement in ORV programs is consistent with and helps to achieve the goals of Executive Order 13045.

## 1.8 DECISION TO BE MADE

- Based on the scope of this EA, the decisions to be made are:
- Should APHIS-WS expand its involvement in ORV programs to the National Forest System lands listed in Appendix H?
- If not, should APHIS-WS attempt to implement one of the alternatives as described in this EA?
- Would implementing the proposed action or one of the other alternatives have significant impacts on the quality of the human environment requiring preparation of an EIS?

## 1.9 GOALS

As stated in the description of the proposed action, the primary goals of the program are to include National Forest System lands within the ORV program to:

- stop the forward advance of the raccoon strain of rabies from areas where it now occurs by immunizing portions of target species populations along the leading edges of the rabies fronts; and
- reduce the incidence of rabies cases involving wild and domestic animals and rabies exposures to humans in the

areas where the ORV programs are conducted.

A Work Plan between the USFS and APHIS-WS has been prepared regarding implementation of ORV programs on National Forest System lands. Additionally, the states that would be involved in the proposed action have established, or are in the process of establishing, plans for the implementation of ORV programs. The proposed action would be consistent with such plans and any statements of goals and objectives as they are developed by the involved state and federal agencies.

## **1.10 SCOPE OF THIS ENVIRONMENTAL ASSESSMENT ANALYSIS**

### **1.10.1 Actions Analyzed.**

This EA evaluates the environmental effects of expanding APHIS-WS participation in ORV programs to National Forest System lands in a number of eastern states to eliminate or stop the spread of raccoon rabies.

### **1.10.2 Period for which this EA is Valid.**

This EA will remain valid until APHIS-WS determines that new needs for action, new unforeseen significant issues, or new alternatives having different environmental effects must be analyzed. At that time, this analysis and document will be supplemented or revised pursuant to NEPA. Review of the EA will be conducted each year by APHIS-WS to ensure that the EA and the analyses contained herein are still appropriate.

### **1.10.3 Site Specificity.**

This EA analyzes potential impacts of expanding APHIS-WS participation in ORV programs to National Forest System lands in some or all of the states described in Section 1.2. Because the proposed action is to assist the affected states in accordance with plans, goals, and objectives developed by those states, the proposed action could involve APHIS-WS participation in ORV bait distribution and monitoring and surveillance or local population reduction of target species anywhere in those states where the need has been identified by the appropriate state agencies. Therefore, all National Forest System lands within the aforementioned states could be affected. National Forests within these states are listed in Appendix H. This EA identifies as much as possible the typical habitat areas and the specific areas that are currently known to be in need of ORV program action. However, the location of every wildlife rabies outbreak that would trigger use of ORV cannot be predicted. Implementation of emergency response and contingency action plans that involve localized population suppression of target species could similarly be needed anywhere in the involved states where outbreaks of the targeted rabies strain occurs. Additionally, changes in funding levels over time could create changes in ORV program activities, such as increasing or decreasing the size of the ORV barrier zone and other areas to be baited and varying the types of monitoring and surveillance and research conducted. Planning for the management of rabies epizootics must be viewed as being conceptually similar to federal or other agency actions whose missions are to stop or prevent adverse consequences from anticipated future events for which the actual sites and locations where they will occur are unknown but could be anywhere in a defined geographic area. Examples of such agencies and programs include fire and police departments, emergency clean-up organizations, insurance companies, etc. Although some of the sites where wildlife rabies outbreaks will occur can be predicted, all specific locations or times where such outbreaks will occur in any given year cannot be predicted. Thus, this EA addresses the substantive environmental issues that pertain to ORV use and monitoring/surveillance activities, and, if necessary, localized target species population reduction wherever these activities might occur on the National Forest System lands identified herein. The analyses in this EA are intended to apply to any action that may occur in any locale, except Wilderness Areas, and at any time within the analysis area. In this way, APHIS-WS believes it meets the intent of NEPA with regard to site-specific analysis and that this is the only practical way for APHIS-WS to comply with NEPA and still be able to accomplish its mission.

### 1.11 SUMMARY OF PUBLIC INVOLVEMENT EFFORTS

Several EAs have been prepared previously to analyze environmental effects of APHIS-WS' continued and expanded participation with an ORV program in several eastern states and Texas. Issues related to the proposed action were identified through involvement and planning/scoping meetings with state health departments, other state and local agencies, academic institutions, the Ontario Ministry of Natural Resources, and the CDC. Additional efforts to determine further issues that the public might have with ORV program implementation were made through a Federal Register Notice (66 FR 13696-13700, March 7, 2001) and by a second Federal Register Notice (66 FR 27489, May 17, 2001) making the EA available to the public for review and comment prior to an agency decision. A letter was sent to potentially affected or interested American Indian Tribes to assure their opportunity to be involved in the EA process. Comments received were reviewed to identify any substantive new issues or alternatives not already identified for analysis. A third Federal Register Notice (66 FR 45835-45836, August 30, 2001) was published announcing the availability of the EA Decision/FONSI (USDA 2001). A Notice of Availability for a subsequent Decision/FONSI was published through a Federal Register Notice (67 FR 44797-44798, July 5, 2002) (USDA 2002a). A Notice of Availability for a supplemental EA and Decision/FONSI was published through a Federal Register Notice (68 FR 38669-38670, June 30, 2003) (USDA 2003a). This EA has been prepared in cooperation with the USFS to expand ORV program assistance to National Forest System lands, excluding Wilderness Areas, in several eastern states. A Notice of Availability for this EA and Decision/FONSI or Notice of Intent to prepare an EIS will be published in the Federal Register once a decision is reached.

## 2.0 CHAPTER 2: ISSUES AND AFFECTED ENVIRONMENT

### 2.1 ISSUES

From public input received in response to a Federal Register Notice (66 FR 13696-13700, March 7, 2001), from interactions and planning/scoping meetings held with state and local departments of health and the CDC, and based on a previous EA (USDA 2001) the following issues were determined to be germane to the proposed action and were considered in detail:

- Potential for adverse effects on people that become exposed to the vaccine or the baits.
- Potential for adverse effects on target wildlife species populations.
- Potential for adverse effects on nontarget wildlife species, including threatened or endangered species and species designated as sensitive by the USFS Regional Foresters.
- Potential for adverse effects on pet dogs or other domestic animals that might consume the baits.
- Potential for the recombined V-RG virus to "revert to virulence" and result in a virus that could cause disease in humans or animals.
- Potential for the V-RG virus to recombine with other viruses in the wild to form new viruses that could cause disease in humans or animals.
- Potential for aerially dropped baits to strike and injure people or domestic animals.
- Cost of the program in comparison to perceived benefits.
- Humaneness of methods used to collect wild animal specimens critical for timely program evaluation or to reduce local populations of target species under state contingency plans.

### 2.2 OTHER ISSUES CONSIDERED BUT NOT IN DETAIL WITH RATIONALE

#### 2.2.1 Potential for Drugs Used in Animal Capture and Handling to Cause Adverse Health Effects in Humans that Hunt and Eat the Species Involved.

This issue could be of concern for raccoons, which are hunted and sometimes consumed by people as food. Drugs used in capturing and handling raccoons for surveillance and monitoring purposes in rabies management programs include ketamine hydrochloride, xylazine (Rompun), and a mixture of tiletamine and zolazepam (Telazol). Meeting the requirements of the AMDUCA (see Section 1.4) should prevent any significant adverse impacts on human health with regard to this issue. Mitigation measures that would be part of the standard operating procedures (SOPs) followed in each state include:

- All drug use in capturing and handling raccoons and other animals would be under the direction and authority of state or federal veterinary authorities, either directly or through procedures agreed upon between those authorities and APHIS-WS.
- As determined on a federal- or state-level basis by these veterinary authorities (as allowed by AMDUCA), ORV program participants may choose to avoid capture and handling activities that utilize immobilizing drugs within a specified number of days prior to the hunting or trapping season for the target species to avoid release of animals that may be consumed by hunters prior to the end of established withdrawal periods for the particular drugs used. However, capture and handling activities will likely extend into the hunting season during late summer/fall ORV baiting schedules. Therefore, target species will either be marked or euthanized if immobilizing drugs are used within 30 days of

hunting or trapping seasons. These measures are taken to avoid release of animals that may be consumed by hunters prior to the end of established withdrawal periods for the particular drugs used.

- Animals that have been immobilized and released will be ear tagged or marked in some other way to alert hunters and trappers that they should contact APHIS-WS personnel before consuming the animal.

By following these procedures in accordance with AMDUCA, rabies management programs would avoid any significant impacts on human health with regard to this issue.

#### **2.2.2 Potential for Adverse Impacts on Wildlife from Aircraft Overflights Conducted in ORV Programs.**

The concern here is that certain wildlife species such as bald eagles and trumpeter swans (A. Montoney, APHIS-WS, pers. comm. 2001) might be disturbed by the aircraft used in ORV bait distribution to the point that they are adversely affected.

The U.S. Department of the Interior (USDI) (1995) reviewed studies on the effects of aircraft overflights on wildlife. The report revealed that a number of studies have documented responses by certain wildlife species that suggest adverse impacts could occur. Few if any studies have proven that aircraft overflights cause significant adverse impacts on populations, although the report stated it is possible to draw the conclusion that impacts to wildlife populations are occurring. It appears that some species will frequently or at least occasionally show adverse responses to even minor overflight occurrences. In general, it appears that the more serious potential impacts occur when overflights are *chronic*, i.e., they occur daily or more often over long periods of time. Chronic exposure situations generally involve areas near commercial airports and military flight training facilities. ORV program aerial bait distribution activities are not chronic, but typically occur only once or twice per year. They are typically conducted at about 500 feet above ground level and only fly momentarily over any one point on the ground during any given bait distribution flight. The aircraft do not circle over areas repeatedly, but fly in straight "transect" lines for purposes of bait distribution.

Some examples of species or species groups that have been studied with regard to this issue and APHIS-WS determination of potential impacts from ORV aerial overflights are as follows:

- Colonial Waterbirds. Kushlan (1979) reported that low level (390 feet followed by a second flight at 200 feet) overflights of 2-3 minutes in duration by a fixed-wing airplane and a helicopter produced no "drastic" disturbance of tree-nesting colonial waterbirds, and, in 90% of the observations, the individual birds either showed no reaction or merely looked up. ORV program overflights typically occur at about 500 feet above ground and would only fly momentarily over any one point on the ground. Thus, it appears that ORV program overflights would result in little or no disturbance to colonial waterbirds.
- Greater Snow Geese. Belanger and Bedard (1989, 1990) observed responses of greater snow geese (*Chen caerulescens atlantica*) to man-induced disturbance on a sanctuary area and estimated the energetic cost of such disturbance. They observed that disturbance rates exceeding two per hour reduced goose use of the sanctuary by 50% the following day. They also observed that about 40% of the disturbances caused interruptions in feeding that would require an estimated 32% increase in nighttime feeding to compensate for the energy lost. They concluded that overflights of sanctuary areas should be strictly regulated to avoid adverse impacts. ORV program overflights typically occur at about 500 feet above ground and would only fly momentarily over any one point on the ground. Thus, it appears that ORV program overflights would result in little or no disturbance to snow geese or other waterfowl species.
- Raptors. Andersen et al. (1989) conducted low-level helicopter overflights directly at 35 red-tailed hawk (*Buteo jamaicensis*) nests and concluded their observations supported the hypothesis that red-

tailed hawks habituate to low level flights during the nesting period. Their results also showed similar nesting success between hawks subjected to such overflights and those that were not. White and Thurow (1985) did not evaluate the effects of aircraft overflights, but showed that ferruginous hawks (*Buteo regalis*) are sensitive to certain types of ground-based human disturbance to the point that reproductive success may be adversely affected. However, military jets that flew low over the study area during training exercises did not appear to bother the hawks, and neither were they alarmed when the researchers flew within 100 feet in a small fixed-wing aircraft (White and Thurow 1985). White and Sherrod (1973) suggested that disturbance of raptors by aerial surveys with helicopters may be less than that caused by approaching nests on foot. Ellis (1981) reported that 5 species of hawks, 2 falcons, and golden eagles were "incredibly tolerant" of overflights by military fighter jets, and observed that, although birds frequently exhibited alarm, negative responses were brief and never limiting to productivity. These studies indicate that overflights by ORV program aircraft should have no significant adverse impacts on raptor populations by affecting nesting success.

Occasional overflights (i.e., radio telemetry, GIS mapping, general aviation and commercial flights, and military training routes by fighter jets, helicopters, and/or transport ships) may occur over National Forest System lands. Overflights for the purposes of ORV bait distribution activities would only occur once or twice per year and aircraft would only fly momentarily over any one point on the ground. The aircraft do not circle over areas repeatedly, but fly in straight "transect" lines for the purposes of bait distribution. The potential impact would be of short-term (only momentary) duration, on a local scale, with negligible intensity and should not add appreciably to the frequency of overflights. The addition of one more overflight per year for ORV bait distribution should not constitute a substantive increase in any effects that might occur as a result of overflights. Furthermore, the types of aircraft used in bait distribution, the DeHavilland (DHC-6) Twin Otter and Beechcraft King Air B200, meet all Federal Aviation Regulation (FAR) requirements regarding noise limits (FAR Part 36, Appendix F). Therefore, cumulative impacts from the combination of ORV bait distribution overflights and other overflights should be negligible. Thus, the short-term duration, infrequency, and negligible intensity of flights over any given area, in addition to the tolerance of wildlife of such activity, indicates ORV program overflights would have a negligible adverse environmental impact on wildlife.

### 2.2.3 Potential for ORV Bait Distribution to Affect Organic Farming.

This issue concerns the potential for ORV baits dropped on crops and livestock operations certified as "organic" under federal regulations to affect the status of the organic certification of such farms. Farmers and livestock producers were concerned they would not be able to sell, label, or represent their harvested crop or plant as organically produced if it had contact with the prohibited substance, which is the vaccine – V-RG (CFR7 Part 205.672). In particular, this concern was raised by a producer of organically raised venison in Ohio (R. Krogwold, Ohio Dept. of Health, pers. comm. 2001) and by an organic farmer in Florida (H. McConnell, APHIS-WS, pers. comm. 2003).

The ORV baits are comprised of a matrix of fishmeal and an ethylene copolymer which is a plastic material. The purpose of the polymer is to hold the fishmeal attractant together in a block that can withstand being dropped from an airplane and that will not dissolve or crumble apart readily when and if it is exposed to rain or melting snow. The process for producing the bait blocks eliminates all potentially reactive compounds (such as ethylene and vinyl acetate) that might have the potential for uptake by plants or absorption into the tissues of animals that consume the baits. Thus, the inorganic polymer in the ORV baits is totally nonreactive and cannot be absorbed by plants or animals (1).

It is also among the types of materials approved by the Food and Drug Administration for use in producing, manufacturing, packing, processing, preparing, treating, packaging, transporting, or holding food (21 CFR Part 177). Therefore, the fishmeal polymer baits should pose no risk of contaminating crops or animals raised for food and, consequently, should have no effect on the ability of certified organic farms to maintain their status.

Field baiting studies suggest deer are not generally attracted to the ORV baits. Out of more than 4,300 baits exposed to target and nontarget animals in field bait acceptance studies in Georgia, Ohio, and Texas,



none were observed to have been taken or consumed by deer, despite the prevalence of deer in the areas where the bait studies were conducted (Linhart et al. *unpublished* 2001). Sulfur compounds are a byproduct of the breakdown of animal proteins, including those found in fishmeal (D. Nolte, APHIS-WS, NWRC, pers. comm. 2001) and are generally repellent to herbivores (Nolte et al. 1994). Therefore, the ORV baits used to address raccoon rabies problems are probably at least somewhat repellent to deer, which probably accounts in part for the lack of observed bait take by deer in the studies reported in Linhart et al. (*unpublished* 2001). For these reasons, it is unlikely that the ORV baits would be consumed by deer on venison farms that are certified as organic producers.

On April 15, 2003, the USDA-Agricultural Marketing Service (AMS) ruled that ORV bait blocks, consisting of a vaccine imbedded in fishmeal bound by a polymer binding agent, on an organic operation would not have an adverse impact on organic operations (see USDA-AMS letter in Appendix G). This ruling was posted on the USDA-AMS website at [www.ams.usda.gov/nop](http://www.ams.usda.gov/nop). The USDA-AMS considers the ORV program to be an emergency disease treatment for the control of rabies and, as such, is addressed under National Organic Program (NOP) section 205.672, Emergency Pest or Disease Treatment. The USDA-AMS determined that "...in the unlikely event that a bait block breaks and exposes a plant(s) to the vaccine, the organic producer can remove the affected plant(s) with no adverse effect on the operation's certification. This would comply with NOP section 205.672(a). The organic status of animals feeding on the ORV bait block and not penetrating the vaccine would not be adversely affected. In the unlikely event that an animal consumes the vaccine within the ORV bait block that animal will lose organic status as provided in NOP section 205.672(b)." The USDA-AMS believes there to be little chance that an organic animal will consume the vaccine within an ORV bait block; however, to reduce the chances of livestock consumption, producers can relocate any bait found within an area containing livestock to a point outside of that area.

#### **2.2.4 Potential for ORV to Cause Abortions in Cattle.**

This issue was raised by a cattle producer in Ohio who reported an increase in abortions of pregnant cows following an ORV bait distribution project. V-RG vaccine was tested in a number of wild and domestic animal species, including cattle, and produced no adverse effects (see Sections 4.2.3.1 and 4.2.4). Although pregnant cattle have not been specifically tested, V-RG has produced no adverse effects on gestation in pregnant female raccoons (C. Rupprecht, CDC, pers. comm. to K. Smith, Ohio Dept. of Health 2001). Recently, a woman who was 18 weeks pregnant in Ohio was exposed to the vaccine when she took a bait away from her dog and later delivered a healthy 10-lb. baby boy (see Section 4.2.1.2). ORV program administrators with the Texas Department of Health have not received any reports of this nature despite the distribution of millions of ORV baits in cattle and other livestock production areas since 1995 (E. Oertli, TX Dept. of Health, pers. comm. 2001). In the U.S., over 51 million doses of V-RG have been distributed to date without any other reported concerns of this nature being raised. Therefore, the reported increase in cattle abortions was determined to be coincidental and not related to ORV. The Ohio producer was provided with further information and advice on determining which of a number of other known possible causes of abortions in cattle might be responsible (R. Hale, Ohio Dept. of Health, pers. comm. 2001).

#### **2.2.5 Potential Human Health Impacts in the Event of Human Consumption of Vaccinated Wildlife.**

The issue expressed here is the potential to develop a vaccinia infection from eating a vaccinated raccoon or some other animal that has eaten one or more ORV baits. ~~\_\_\_\_\_~~ was consulted to obtain information on this issue. Mahnel (1987) reported results of experiments to determine the stability of poxviruses (which include vaccinia used in the V-RG vaccine). "Naked" vaccinia (i.e., vaccinia found outside of host cells) will be inactivated within minutes by heat above 56 degrees Celsius (133 degrees Fahrenheit), by ultra-violet irradiation (sunlight), or by exposure to acid with a pH of 3 or

less<sup>3</sup> (e.g., similar to the acid environment found in the stomach of raccoons which is where the bulk of V-RG vaccine would end up). In contrast, however, poxviruses can be relatively stable for years in dry dust or in dried lesion crusts.

The vaccinia from V-RG would generally only bind to animal tissues in the mucous membrane of the oral cavity, pharynx and esophagus since V-RG does not have the tendency to spread throughout the animal. Those particular tissues are rarely consumed by humans, but if they were, they would most likely be cooked which would kill the virus. Also, concentrations of vaccinia in those tissues should be low because mucosa is not considered a tissue where the virus tends to accumulate (~~\_\_\_\_\_~~).

Although cell-bound vaccinia is generally more resistant than free virus, humidity and cellular enzyme activity in the tissues as well as bacterial decomposition (e.g., in the gut of ruminants), normally results in inactivation of the virus. In the environment, inactivation of pox viruses is accelerated by temperature changes (~~\_\_\_\_\_~~).

The above information suggests that possible sources of contamination with vaccinia would be V-RG dried onto the fur of an animal, ingested virus in the stomach, or cell-bound virus in mucous membranes. However, with the combined activity of sunlight and ultraviolet light, humidity, stomach pH and/or bacteria/enzymes, temperature fluctuations, and cooking heat, the risk to human health should be small, especially when taking into consideration the attenuated or weakened condition of the vaccinia in the V-RG vaccine. Therefore, the potential for adverse health effects from consuming animals that have eaten ORV baits should be low.

#### **2.2.6 Potential Impacts on Water Resources, including Aquaculture, Fish, Reptiles, and Amphibians.**

A concern has been expressed regarding the potential impacts of unconsumed V-RG vaccine and baits adversely impacting ground and surface water resources and aquaculture through direct and indirect exposure. Those baits that are not consumed may remain in the environment for several months after placement dependent upon environmental conditions (precipitation, temperature, etc.) and the physical condition of the baits. Potential impacts to water resources are greatly reduced by the limited number of baits that are dropped in a specific area, the biodegradability of the vaccine liquid and baits, the high consumption rate of ORV baits by animal species, the safety and efficacy of the vaccine, and the SOPs that are used when dropping baits near a large water source. This conclusion is based upon:

- The possibility of a large quantity of ORV baits being exposed to a site specific water resource is extremely low due to the bait distribution densities used by the program. Under the proposed program, ORV baits would be distributed from aircraft at an average density of 75 per square km.
- The baits are non-toxic. The baits used for the ORV program are small blocks of fishmeal that are held together with a polymer binding agent and are considered to be "food grade" materials. Therefore, the unconsumed bait material would biodegrade when exposed to the environment causing little to no effect on water resources.
- The vaccinia virus and other orthopoxviruses will not replicate in water and do not replicate or reproduce themselves in non-warmblooded species (Rupprecht, CDC, pers. comm. 2002). Therefore, ORV is not expected to cause any adverse effects on fish, reptiles, amphibians, or any invertebrate

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<sup>3</sup> pH is the measure of acidity or alkalinity of a solution with numbers below 7 representing a progressively more acidic solution. A pH of 3 is highly acidic.

species should any members of these species groups consume ORV baits or otherwise be exposed to the vaccine.

- The ORV baits are readily taken up and consumed by wildlife species, thereby limiting long term exposure to the environment. The likelihood of a bait being consumed is dependent upon several factors including animal population densities (target and nontarget species), bait preference, and the availability of alternative food sources. In field tests conducted in the U.S., the majority of ORV baits have been consumed within the first 7 to 14 days after placement, with reports of up to 100% of the baits being consumed within a 7 day period (Farry et al. 1998b, Hable et al. 1992, Hadidian et al. 1989, Hanlon et al. 1989a, Linhart et al. 1994, Steelman et al. 2000; USDA 1995a).
- The V-RG virus biodegrades when exposed to the environment. The V-RG virus that is not consumed by the target species or other vertebrates will become inactivated over a relatively short period of time. Persistence and stability of the V-RG virus outside of an organism is highly dependent on ambient temperature and local environmental conditions; the higher the temperature the quicker the virus will become inactive (USDA 1992; USDA 1995a). For example at temperatures between 68 and 100 degrees Fahrenheit the liquid vaccine potency remains stable for approximately 14 to 7 days, respectively, in the un-punctured sachet or inside the bait. In situations where the bait and sachet are damaged inactivation of the V-RG virus will occur more rapidly. A more detailed discussion of the development of ORV baits can be found in Chapter 1.
- Program SOPs limit the possibility of ORV baits being directly dropped into large water sources such as rivers, lakes, and reservoirs. When the aircraft approaches a large body of water the bait dropping equipment is shut off approximately ¼ mile from the water source to reduce the possibility of ORV baits falling into the water. Nevertheless, due to changing environmental conditions and the limited possibility of human error when operating the bait dropping equipment there is the possibility that baits may inadvertently be dropped into a body of water. Exposure of the V-RG vaccine into a water source from an intact bait and sachet is highly unlikely. The vaccine is enclosed in a sealed sachet thereby limiting the possibility of the vaccine liquid being directly released into a water source. Even if the vaccine was released into a water source through a damaged or punctured sachet, it is highly unlikely that the vaccine will cause any adverse affects since the vaccine liquid is biodegradable and nontoxic (USDA 1991; USDA *undated a, undated b*).

The above information indicates that V-RG vaccine and baits pose no threat to groundwater or surface water through direct or indirect means.

#### **2.2.7 Effects on Carnivore Populations in the Absence of Rabies.**

Concern has been expressed that specific carnivore populations may increase in the absence of the rabies virus as a mortality factor, leading to adverse effects on prey populations such as threatened and endangered species. Raccoon strain of the rabies virus, specifically, has only relatively recently spread, and currently is contiguously distributed from Alabama to Maine, west to the eastern Ohio border with Pennsylvania (Krebs et al. 2001, Kemere et al. 2001). Translocation of rabid raccoons to the mid-Atlantic states has been implicated in establishing a new rabies foci in the mid-1970's (Krebs et al. 1999), from which rabies has spread through the raccoon population at rates averaging about 30 miles/year (Kemere et al. 2001).

Rabies is only one of several diseases that may help regulate carnivore populations. Prior to the introduction of raccoon rabies into the mid-Atlantic region in the late 1970's, canine distemper was considered a primary disease mortality factor in raccoons, gray foxes, and skunks (Roscoe 1993, Davidson et al. 1992). The epizootiology of canine distemper in raccoons in New Jersey and Florida has been characterized by outbreaks at the end of the mating season in March and with increased movements of young in September (Roscoe 1993, Hoff et al. 1974). Because of the cyclic nature of canine distemper outbreaks (4 year intervals), the wide distribution of canine distemper cases, and the low incidence of the

disease between epizootic peaks in New Jersey, Roscoe (1993) proposed an enzootic status for canine distemper for raccoons that becomes epizootic when raccoon densities reach high levels. Evans (1982) found that 50 to 90% of raccoons and gray foxes may be incapable of producing protective levels of antibody against the canine distemper virus, implicating it as a potentially important disease mortality factor. Davidson et al. (1992) diagnosed canine distemper in 78% of gray foxes studied in the southeastern U.S. and found canine distemper to be more significant as a mortality factor for gray foxes than all other infectious and noninfectious diseases combined. Roscoe (1993) reported that the effects of canine distemper on raccoon populations may diminish if raccoon rabies spreads and that concurrent canine distemper and rabies epizootics may become more common. The dynamics of sympatric rabies and canine distemper are not well understood; however, rabies may compensate for deaths that would have historically occurred due to canine distemper infection. Important attributes of canine distemper include that it is not a zoonotic disease like rabies and it historically has been implicated as a virus of importance to carnivore mortality.

#### **2.2.8 The Affected Area Described in the EA includes USFS Lands that Have Not Been Identified as Having a Rabid Raccoon Problem.**

The affected area of the EA includes National Forest System lands that have or have the potential for a raccoon rabies outbreak to occur. ORV baits are distributed based upon vaccination zones. These vaccination zones are determined in cooperation with the involved state rabies task forces, state agencies, and/or other agencies with jurisdiction over vaccine use and application in wildlife and domestic animal species. Vaccination zones are delineated based on the most current distribution of rabies cases and the expected direction of disease spread. Therefore some, all, or none of the USFS lands identified in this EA may be involved in an ORV bait distribution program on an annual basis. Figure 1-5 in Chapter 1 shows the current anticipated ORV zone based upon recent outbreaks of the virus. The National Forest System lands included in this EA were chosen since they have the greatest possibility of being involved in the overall efforts of stopping the northward and westward spread of the rabies virus in the eastern U.S.

### **2.3 AFFECTED ENVIRONMENT**

This section presents some descriptive information on the environment of the areas that would be affected by the proposed action. Other descriptive aspects of the affected environment are included in Chapter 4 in the analysis of effects which is based on the environmental and other types of issues identified in Section 2.1.

The area of the proposed program would be expanded to National Forest System lands (Appendix H), excluding Wilderness Areas, located within several eastern states where raccoon rabies outbreaks currently occur or are expected to occur. The affected states include: Maine, New York, Vermont, New Hampshire, Massachusetts, Maryland, New Jersey, Pennsylvania, Ohio, Virginia, West Virginia, Tennessee, Kentucky, North Carolina, South Carolina, Alabama, Georgia, and Florida. Currently, ORV program activities (cooperative rabies surveillance activities and/or baiting programs) are conducted in many of the aforementioned states on a variety of different land classes, excluding National Forest System lands. The proposed program would be part of a broader program to create zones of vaccinated target species that would then serve as barriers to cease the further advancement of raccoon rabies virus variants. The potential areas involved are extensive and may cover diverse land uses, including: cultivated agricultural lands, forests, meadows, wetlands, rangelands and pastures representing diverse wildlife habitats. Aerial distribution of ORV baits would avoid urban and suburban areas that support high human population densities, as well as lakes, rivers, and Wilderness Areas. Aerial distribution of baits would primarily target rural areas as well as known areas of habitat suitable for the target species. When aerial distribution by fixed-wing or helicopter aircraft is not practical, baits would be distributed by careful hand placement to help to minimize contact by humans, pets and other domestic animals.

Figure 1-4 in Chapter 1 shows the National Forest System lands within the states where APHIS-WS could expand assistance to and participation in ORV programs under the proposed action. Figures 1-5 A, B, and C in Chapter 1 show the approximate ORV bait drop areas anticipated for 2003 and beyond. It must be kept in mind, however, that ORV baiting activities might be needed, and might therefore be conducted, on other National Forest System lands in other areas within the involved states as part of the proposed action. The ORV bait drop areas are also the primary

expected areas where assistance by APHIS-WS is expected to be requested to collect blood, tooth and other biological samples from target animals for monitoring and surveillance. However, monitoring or surveillance activities by APHIS-WS could also occur anywhere in the respective states where state health or other appropriate agency officials determine there is a need to insure project effectiveness. Implementation of emergency response and contingency action plans that involve localized population suppression of target species could similarly be needed anywhere in the involved states where outbreaks of the targeted rabies strain occurs. Additionally, changes in funding levels over time could create changes in ORV program activities, such as increasing or decreasing the size of the ORV barrier zone and other areas to be baited and varying the types of monitoring and surveillance and research conducted.

"Major Habitat Types" as described by Ricketts et al. (1999) that encompass the National Forests within states that would be affected by ORV programs under the proposed action are: Temperate Broadleaf and Mixed Forests (ME, NH, VT, NY, PA, OH, NJ, MD, VA, WV, GA, NC, SC, TN, KY, AL), Temperate Coniferous Forests (AL, FL, GA, NC, SC), Flooded Grassland (FL), and Mississippi Riverine Forests (TN, KY). Appendix E shows the "ecoregions" (i.e., broad level ecosystems) that occur in the potentially affected states (Bailey 1995). Ecoregions range from humid tropical areas and southern pine and hardwood forest areas in the southeast, to broadleaf deciduous forest, mixed-deciduous forest and coniferous forest, and boreal forest types in the east and northeast.

Table 2-1 shows some descriptive statistics for the states participating in ORV programs. The states contain over 10 million acres of National Forest System land. The percentage of federal land in each state ranges from 0.3% to more than 13% and comprises almost 5% of the total area of the affected states. Baiting federal lands, such as National Forests, aids in adequate ORV coverage of affected areas and is necessary for program effectiveness.

**Table 2.1: Some Descriptive Statistics of States Participating in the ORV Program.**  
(data from USDC 1999)

State	Total area (1000 acres)	National Forest Land (1000 acres)	Total area owned by federal gov't. (1000 acres)	% area in federal govt. ownership
AL	32,678	665	1,234	3.8
FL	34,721	1,147	3,066	8.8
GA	37,745	865	1,864	5.0
KY	25,512	693	1,234	4.8
ME	21,594	53	168	0.8
MD	6,319	0	167	2.6
MA	5,035	0	72	1.4
NH	5,769	725	759	13.2
NJ	4,813	0	119	2.5
NY	30,681	0	106	0.3
NC	31,403	1,244	2,356	7.5
OH	26,222	227	392	1.5
PA	28,804	513	670	2.3
SC	19,374	613	1,107	5.7
TN	26,728	634	1,658	6.2
VT	5,937	366	372	6.3
VA	25,496	1,657	2,284	9.0
WV	15,411	1,033	1,178	7.6
Total	384,242	10,435	18,806	4.9
US	2,271,343	191,785	630,266	27.7

A number of American Indian Tribes are located in the states that are involved in the ORV program and are shown in Appendix F.

Chapter 4 contains further affected environment information with respect to target and nontarget species and T&E species.

### 3.0 CHAPTER 3: ALTERNATIVES

#### 3.1 ALTERNATIVES CONSIDERED, INCLUDING THE PROPOSED ACTION

**Alternative 1. No Action.** This alternative would imply no involvement by APHIS-WS in rabies prevention or control on National Forest System lands within the states identified in Section 1.2. The "No Action" alternative is a procedural NEPA requirement (40 CFR 1502), is a viable and reasonable alternative that could be selected, and serves as a basis for comparison with the other alternatives. APHIS-WS could still assist with the ORV program outside of National Forest System lands. Bearing permission by the USFS, the states could conduct ORV programs on National Forest System lands without APHIS-WS assistance.

**Alternative 2. Proposed Action.** (preferred alternative). This alternative would involve the expanded use of federal funds by APHIS-WS to purchase V-RG oral vaccine baits and to participate in their distribution on several National Forest System lands, excluding Wilderness Areas, located within selected areas of the various states listed in Section 1.2 under the authorities of the appropriate state agencies in their ongoing efforts of eliminating or stopping the forward spread of raccoon rabies in the eastern U.S. The proposed action would also include APHIS-WS assistance in monitoring and surveillance activities involving the capture and release or lethal collection of the targeted animal species on National Forest lands to take biological samples for testing to determine the effectiveness of the ORV programs. APHIS-WS could also assist state agencies in implementing contingency plans that include the localized population reduction of the target species in areas where rabies outbreaks occur beyond ORV barriers, which may encompass National Forest lands.

**Alternative 3. Live-Capture-Vaccinate-Release Programs.** This alternative would involve live capture of the target species, raccoons, on National Forest System lands followed by administration of rabies vaccines by injection and release back into the wild. This strategy has been used in certain localized areas for reducing the incidence and spread of rabies in raccoons (Brown and Rupprecht 1990; Rosatte et al. 1990; Rosatte et al. 1992; Rosatte et al. 1993) and skunks (Rosatte et al. 1990; Rosatte et al. 1992; Rosatte et al. 1993). Currently, no vaccine is specifically licensed for this type of use (CDC 2000). However, certain injectable vaccines may be used "off-label" under the direction of veterinarians to vaccinate wild animal species in certain situations (J. Mitzel, APHIS-Veterinary Services, pers. comm. 2001). This method generally results in a higher percentage of a raccoon population being vaccinated than ORV, but takes much longer to accomplish in a given area; for example, in Ontario, seven trappers working from July to October were required to trap and vaccinate 50-85% of the raccoons in an area less than 700 sq. km., whereas the same area could have been treated with aerially dropped ORV baits in half a day (C. MacInnes, Ontario Ministry of Natural Resources, pers. comm. 2001). With this alternative, APHIS-WS would still assist with the ORV program outside of National Forest System lands.

**Alternative 4. Provide Funds to Purchase and Distribute ORV baits without Animal Specimen Collections or Lethal Removal of Animals under Contingency Plans.** Under this alternative, APHIS-WS would provide resources for and assistance in National Forest System land ORV bait distribution only and would not engage in or provide funds for the collection of wild animal specimens for monitoring and project evaluation purposes or for implementation of localized lethal removal actions under state contingency plans. APHIS-WS could still assist with all aspects of the ORV program outside of National Forest System lands. The states could still conduct animal specimen collections or lethal removal of animals on National Forest System lands without APHIS-WS assistance.

#### 3.2 ALTERNATIVES CONSIDERED BUT NOT IN DETAIL, WITH RATIONALE

##### 3.2.1 Depopulation of Target Species.

This alternative would result in the lethal removal of raccoons (on National Forest System lands in some or all of the eastern states listed) throughout the zones where outbreaks of the rabies strain is occurring or is expected to occur. The goal would be to achieve elimination of the rabies strain by severely suppressing populations of the target animal species over broad areas so that the specific strain of rabies could not be transmitted to susceptible members of the same species. This could theoretically stop the forward advance of the disease and potentially result in elimination of the particular rabies variants as infected animals die from rabies before they could transmit it to other members of the same species.

Localized population reduction has been proposed as part of local programs to address raccoon rabies outbreaks as they are just beginning (Rosatte et al. 1997). This was deemed necessary because by the time a suspected rabies case is confirmed through animal testing, there invariably are other raccoons in the area that have been infected and are incubating the disease, at which point vaccination would not be effective for those individuals (Rosatte et al. 1997).

Population reduction is often suggested as a method to control rabies in wildlife populations since the disease is density dependent (Debbie 1991). Bounty incentives, regulated hunting and trapping, ingestible poisons, and fumigation of dens have all been employed to control populations with varying levels of success. MacInnes (1998) reviewed some of the past efforts to control rabies with population reduction of carrier species and concluded that, with a couple of exceptions, most such efforts have failed. In some of the situations, it could not be determined whether an observed decline or disappearance of rabies cases was attributable to population control work or to the disease simply reaching some unexplainable geographical limitation or just dying out on its own (MacInnes 1998). Also, population control as a strategy can be questionable because the leading edges of rabies outbreaks do not necessarily coincide with the edge of the range of the principal "vectors" (e.g., raccoons), nor are they always necessarily related to the population density of such vectors (MacInnes 1998).

Hanlon et al. (1999) reviewed historical efforts to control rabies through population reduction and evaluated the potential for success with this strategy. Information and conclusions they presented are summarized as follows:

Skunk rabies was successfully controlled in Alberta, Canada by this strategy (Pybus 1988). Success was attributed to a high level of effort during several years, the well-defined behavior of skunks in prairie habitats, and access to an effective method (Pybus 1988). Compensatory changes in carnivore reproduction (i.e., the tendency for larger litters and larger percentages of adult females to have litters) and dispersal (i.e., immigration of animals from surrounding uncontrolled populations) can limit the effectiveness of controlling population numbers of other species in different conditions (Clark and Fritzell 1992; Thompson and Fleming 1994).

Population reduction with toxicants as a broadscale control alternative for rabies is impractical. The only approved toxicant methods currently available are sodium cyanide in the M-44 device (registered for zoonotic disease control involving wild canids), and carbon monoxide-producing gas cartridges that can be used to kill skunks, coyotes, and red foxes in dens. Currently, these methods are primarily used in limited areas of the western U.S. for livestock protection. Presently, population reduction is most likely to be publicly accepted and effective in localized or site-specific scenarios in the U.S. (e.g., reducing the density of raccoon populations in parks where visitors may come in contact with potentially rabid animals).

Population reduction using strychnine baits has reportedly been used successfully to stop the spread of rabies in foxes in Denmark (Gaede 1992). Carcass recovery statistics indicated nontarget species [498 martens (*Martes* sp.), twelve European badgers (*Meles meles*), and four domestic dogs] were killed in slightly greater numbers than the targeted red foxes (n=482). The number of rabies cases declined sharply and the country has reportedly remained free of terrestrial rabies since 1982 (Gaede 1992). Broadscale population control with toxicants is most likely politically infeasible in the U.S. due to opposition by the public and by state wildlife agencies.

This alternative was not considered in detail because of the high level of effort that must be maintained almost indefinitely. This alternative would also undoubtedly be opposed by most members of the public as well (MacInnes 1998). Population suppression can be a challenge to maintain in many situations due to immigration (of other members of the same species from surrounding populations) and compensatory reproduction (i.e., larger litters and greater

percentages of females breeding following population reduction) (Clark and Fritzell 1992, Connolly and Longhurst 1975). These factors can mean local populations can recover to their previous levels within a few months or a year, thus requiring annual or more frequent suppression efforts to maintain such populations at low levels. Nevertheless, temporary localized population suppression activities could be conducted in an integrated program of ORV use as part of the proposed action, but such activities, if conducted at all, would be expected to occur as a part of contingency actions in response to a breach in a vaccination barrier. In Texas, localized population suppression of mammalian predator species for this purpose has been covered in other EAs (USDA 1997a, 1997b, 1997c, 1997d, 1997e, 1997f, 1997g, 1997h, and 1997i).

### 3.2.2 Population Control through Birth Control.

Under this alternative, APHIS-WS would provide funds or operational assistance to implement one or more methods to control populations of the target species on National Forest System lands by reducing reproduction. Such methods could involve live capture and surgical sterilization [reviewed by Kennelly and Converse (1997)], the use of chemical reproductive inhibitors placed out in baits or delivery devices (Balser 1964, Linhart et al. 1968), or the application of *immunocontraception* strategies (i.e., vaccines that can cause infertility in treated animals).

The suppression of reproduction over time would eventually reduce the size of target species populations and lead to a reduction in the potential for the spread of the rabies by reducing the chances of contact between infected and healthy animals. However, this approach would do nothing in the immediate short term to reduce the risk of rabies spread in the existing populations, since those animals would continue to be present and capable of contracting and passing on the disease. Therefore, this type of strategy would be viewed as a longer term remedy for stopping rabies spread. It would probably not be useful in meeting the immediate needs for stopping a localized outbreak of rabies that occurs beyond designated ORV bait drop zones.

Live capture and surgical sterilization of whole local populations of animals would be extremely expensive, time-consuming, and difficult to achieve. Considerable expense would be involved in employing experienced and qualified veterinarians to perform large numbers of surgical procedures on captured animals. From a rabies control standpoint, if all or nearly all of a local population could be live captured, it would be more effective and less costly to administer rabies vaccinations by injection, which is already considered as Alternative 3.

Immunocontraception is a potentially useful concept for mammalian population suppression but is still in the early stages of research and development (Bradley 1995, Miller 1997). Genetically engineered vaccines that cause a target species to produce antibodies against its own sperm or eggs or that affect reproductive hormone functions have been produced (Miller 1997). Logistical concerns that still need to be addressed before this method could be applied successfully in the field include durability of the contraceptive vaccines in baits after distribution in the field, and the limitation of current vaccine designs that require baiting an animal population twice about one month apart to successfully treat individual wild animals (Miller 1997). Also, it is likely that a greater proportion of the population would have to be treated with contraceptive vaccines than with rabies vaccines in order to achieve effective rabies control; thus, achieving effective control would be more costly and difficult under this alternative than under ORV programs (C. MacInnes, Ontario Ministry of Natural Resources, pers. comm. 2001). Environmental concerns with this strategy that still need to be addressed include safety of the proposed genetically engineered vaccines to humans, other wildlife species, and even in nontarget members of the target species - e.g., juveniles that might consume baits (Miller 1997, Guyann 1997, Hanlon and Rupprecht 1997).

No contraceptive agents are currently registered for raccoons and are thus not legal for use. For all of the above reasons, birth control strategies to control rabies will not be considered further.



### 3.2.3 Employ Other Types of ORV instead of the V-RG Vaccine.

Under this alternative, APHIS-WS would provide funds to purchase and use a “modified-live-virus” (i.e., “attenuated” or weakened strain that has been shown to have little chance of causing rabies in treated animals) or perhaps “killed-virus” (i.e., “inactivated” virus) oral vaccines instead of the V-RG vaccine in ORV baits on National Forest System lands. Modified-live-virus vaccines include those that have been used in the past in the U.S. to vaccinate domestic animals by injection. Oral baits that employed several strains of these types of virus vaccines have been investigated and used in Europe to stop the spread of rabies in red foxes (Flamand et al. 1993, Artois et al. 1993, Artois et al. 1997). They have also been tested in red foxes in Canada (Lawson et al. 1989, Lawson et al. 1997), and in red foxes and raccoons in the U.S. (Rupprecht et al. 1989, Rupprecht et al. 1992b).

The primary concern with attenuated or “live” virus vaccines (e.g., SAD and ERA) is that they can sometimes cause rabies (Flamand et al. 1993, Pastoret et al. 1992). Flamand et al. (1993) reported that one strain used widely in oral baits in Europe to vaccinate wild red foxes in the 1970s could cause rabies in rodents when injected and that the ability to cause rabies in nontarget animals by other modes (i.e., oral administration) could not be ruled out. Previously used attenuated strains are also “heat sensitive” which can limit their use in warmer seasons or climates (Pastoret et al. 1992). These types of safety concerns with attenuated rabies virus vaccines have been sufficient to prevent their approval for use in the U.S. (Rupprecht et al. 1992b).

Inactivated or “killed” virus rabies vaccines are safer than “live” vaccines in that they cannot cause rabies. This type of vaccine was found to be less effective in causing immunity when delivered into the intestinal tract in foxes (only 30% effective in test animals) and took two doses to cause immunity in the foxes that were successfully immunized (Lawson et al. 1989). Also, the amounts of virus particles that would have to be ingested in oral baits by wild carnivores to effectively vaccinate them would be 100 to 1000 times the amount of the live-attenuated virus particles required (Rupprecht et al. 1992b). To manufacture vaccines with these amounts would probably be cost-prohibitive (Rupprecht et al. 1992b).

Currently, RABORAL V-RG® is the only vaccine licensed for use in raccoons (CDC 2000). For all of the above reasons, this alternative was not considered further.

## 3.3 MITIGATION IN STANDARD OPERATING PROCEDURES FOR RABIES ORV PROGRAMS

Mitigation measures are any features of an action that serve to prevent, reduce, or compensate for impacts that otherwise might result from that action. Because of extensive public and interagency involvement in the development of ORV programs and strategies, a number of key mitigating measures are currently part of the standard operating procedures of state-operated ORV programs. Other mitigating factors were requested by USFS personnel regarding ORV activities on National Forest System lands. These factors include:

- The USFS would be notified prior to project implementation on National Forest System lands.
- Media materials, such as pamphlets, fliers, and posters, would be provided to the appropriate USFS Regional Offices and Ranger Districts to inform visitors of the ORV program. Additionally, public information, education, and media announcements would be made available to inform the public about ORV bait distribution activities in each county before they occur. APHIS-WS would coordinate with the appropriate state agency involved in the ORV program on preparing leaflets, posters, press releases or other media to distribute to the public. Leaflets and posters would be posted in schools, hospitals, campgrounds, visitor centers, and state and county public agency offices. Notification of ORV bait drops would be sent to the State Police, state emergency management associations, county hazardous materials coordinators, county cooperative extension agents, state and federal correctional facilities,

wildlife rehabilitators, and medical and veterinary facilities within the ORV area informing them of the program and providing information about the ORV bait and vaccine and potential exposure issues.

- Toll-free telephone numbers would be advertised in the media and on web sites for people to call for answers to questions.
- In the unlikely event that an adverse vaccinia virus exposure in humans occurs (see recent example described in Section 4.2.1.2), the CDC can make vaccinia immune globulin available to a state on a case-by-case basis to provide a level of additional assurance that such a reaction would be successfully treated.
- Bait distribution navigators would be trained to avoid dropping baits on people or structures. During aerial bait drop operations, the bait dispensing equipment is temporarily turned off over human dwellings, cities, towns, greenhouses, certain sensitive domestic animal pens, and when people are observed below.
- APHIS-WS personnel would adhere to air safety standards.
- APHIS-WS personnel would be trained in hand distribution of baits to avoid properties with greater risk of human or pet encounters with baits.
- Off-road vehicle use may become necessary if hand baiting operations are deemed appropriate. All USFS closures prohibiting off-road vehicle travel would be strictly adhered to except as permitted by the appropriate USFS personnel.
- Labels would be placed on each ORV bait instructing persons not to disturb or handle them. Labels would contain a toll-free telephone number to call for further information and guidance in the event of accidental exposure to the vaccine (see Figure 1-2 in Chapter 1).
- Methods used to capture raccoons would mainly involve the use of cage traps; however, other methods such as shooting, leg hold traps, and snares may be used in some programs. Animals caught in cage traps that must be sacrificed (killed) for testing, local depopulation, or per cooperating landowner's request would be euthanized in accordance with recommendations by the American Veterinary Medical Association and APHIS-WS policy.
- Capture devices would be checked on a daily basis.
- Field personnel involved in trapping and handling animals for monitoring and surveillance purposes would be immunized against rabies and tetanus.
- All drugs used in capturing and handling raccoons and other animals would be under the direction of state or federal veterinary authorities, either directly or through procedures agreed upon between those authorities and APHIS-WS.
- Monitoring and surveillance activities may extend into the hunting season during late summer/fall ORV baiting schedules. Therefore, target species would either be marked or euthanized if capture and handling activities that utilize immobilizing drugs are used within 30 days of hunting or trapping season. These measures are taken to avoid release of animals that may be consumed by hunters prior to the end of established withdrawal periods for the particular drugs used.
- Animals that have been immobilized and released would be ear tagged or marked in some other way to alert hunters and trappers that they should contact APHIS-WS personnel before consuming the animal.
- Aerial baiting would not be conducted in any designated Wilderness Areas of National Forest System lands.

## CHAPTER 4: ENVIRONMENTAL CONSEQUENCES

This section analyzes potential environmental consequences using Alternative 1 (no action) as the baseline for comparison with the other alternatives to determine if the real or potential impacts are greater, lesser or the same. Table 4-1 at the end of this chapter summarizes a comparison of the issues and impacts to each alternative.

The following resource values in the states involved in the proposed action would not be significantly impacted by any of the alternatives analyzed: soils, geology, minerals, water quality/quantity, flood plains, wetlands, visual resources, air quality, prime and unique farmlands, aquatic resources, timber, and range.

### 4.1 Alternative 1 -- No Action (No Involvement by APHIS-WS in Rabies Prevention or Control on National Forest System Lands)

#### 4.1.1 Potential for Adverse Effects on People that Become Exposed to the Vaccine or the Baits.

Under this alternative, APHIS-WS would not participate in an ORV program on National Forest System lands. APHIS-WS would still purchase funds for use on other lands within the involved states in the eastern U.S. Baiting National Forest System lands is important for achieving an effective program. If baiting programs were conducted around these large land masses, reservoirs of the virus would likely still exist, creating holes in the program and potentially making the program less effective at stopping the forward advance or eliminating the raccoon strain of the rabies virus. The states may seek approval to fund and conduct ORV programs on National Forest System lands to some degree without APHIS-WS assistance. They may seek other sources of federal funds to complement state or other sources of funding. If this is the case, people would still have the potential to come into contact with baits or the vaccine; however, the potential would be less. Actual risks of adverse effects from exposure to vaccinia virus would still be exceedingly low and insignificant.

It is conceivable that federal coordination of ORV programs would actually result in fewer numbers of ORV baits used over the years or that ORV bait use in many areas would be for shorter time periods. This is because effective federal coordination may have a better chance of stopping or even eliminating one or more of the several rabies strains from large areas than if the individual states are left to themselves to conduct ORV programs.

##### 4.1.1.1 Potential to Cause Rabies in Humans.

The no action alternative would most likely result in greater risk of human exposure to rabies than the proposed action (Section 4.2) because reservoirs of the virus would likely still exist on National Forest System lands. If states fund and conduct programs on these lands without APHIS-WS assistance, they would have less chance of being successful in stopping or preventing the spread of the raccoon rabies variant. Therefore, an absence of APHIS-WS participation and funding on National Forest System lands could be expected to result in increased risk of human rabies cases because of expanding epizootics. The V-RG vaccine would not cause rabies under any expected scenario involving the distribution of ORV baits.

##### 4.1.1.2 Potential for Vaccinia Virus to Cause Disease in Humans.

Under the no action alternative, V-RG oral vaccine containing the vaccinia virus vector would still be available for state-approved use in ORV programs on National Forest System lands. Such programs would probably be conducted on a lesser scale without APHIS-WS funds and participation. The potential for vaccinia-related disease cases would be lower than under the proposed action. The likelihood that any cases would

occur is extremely remote under any expected scenario involving the distribution of ORV baits.

#### **4.1.1.3 Potential to Cause Cancer (Oncogenicity).**

Under the no action alternative, V-RG oral vaccine containing the vaccinia virus vector would still be available for state-approved ORV programs on National Forest System lands, but would probably be used on less total land area without APHIS-WS funds and participation. Because the vaccinia virus used in the V-RG vaccine is not a cancer-causing agent, expected scenarios involving the use of ORV baits by the states would not result in increased cancer risks.

Based on this information, risks to humans from contact with the V-RG vaccine are believed to be minimal with or without APHIS-WS funding or assistance. The risk and potential severity of adverse effects from rabies exposures in humans would probably be greater without ORV programs on National Forest System lands than would be the risk of serious adverse effects from vaccinia virus infections with ORV programs.

#### **4.1.2 Potential for Adverse Effects on Target Wildlife Species Populations.**

Under the no action alternative, APHIS-WS baiting programs would be conducted around the National Forest System lands located within ORV zones. Therefore, raccoons found within this land class would not be baited and would not be vaccinated against rabies. If state-run programs initiated ORV programs on National Forest System lands, fewer raccoons would be vaccinated against rabies without APHIS-WS contribution to ORV bait purchases and distribution. Therefore, more animals would likely die from rabies on National Forest System lands with potentially greater short-term population impacts. Such impacts would be expected to recur as raccoon populations have strong capabilities to recover (Connolly and Longhurst 1975, Fritzell 1987, and Sanderson 1987), which would establish new populations susceptible to rabies mortality. If ORV programs are not conducted on these lands, reservoirs of the virus could remain in untreated areas making the total elimination of this strain of the virus highly unlikely. Additionally, if the state ORV programs failed for lack of APHIS-WS assistance, rabies epizootics may be expected to occur that would likely result in short-term die-offs of target species over broader geographic areas.

##### **4.1.2.1 Effects of the ORV V-RG Vaccine on Raccoons.**

Under the no action alternative, states would still be able to employ the V-RG oral vaccine to combat raccoon rabies. As concluded in the analysis below in Section 4.2.2, baits using the V-RG vaccine would have no adverse impact on raccoon populations.

##### **4.1.2.2 Effects of Monitoring/Surveillance or Localized Population Reduction (Contingency Actions) on Raccoon Populations in Eastern States.**

Under the no action alternative, states would still likely implement some level of monitoring, control, and, potentially, implementation of contingency actions in response to breaches in vaccination barriers that result in localized population suppression to attempt to maintain the integrity of vaccination barriers. The numbers of raccoons killed under such programs would probably be less than if APHIS-WS funds and personnel were available. Therefore, as supported by the analysis in Section 4.2.2.2, effects on raccoon populations would be insignificant.

#### **4.1.3 Potential for Adverse Effects on Nontarget Wildlife Species, including Threatened or Endangered Species.**

##### **4.1.3.1 Effects of the V-RG Vaccine on Nontarget Wildlife including Threatened or Endangered Species.**

Under the no action alternative, there would be no potential for APHIS-WS assistance to result in adverse impacts on nontarget wildlife on National Forest Service lands because of ORV programs. This alternative could result in an increase in exposure of nontarget wildlife to the rabies virus. Reservoirs of the virus could remain in untreated areas making the total elimination of this strain of the virus highly unlikely. However, state-run programs would still be free to conduct ORV programs on National Forest System lands using the V-RG vaccine. Such programs would probably be conducted on a reduced scale without APHIS-WS participation. However, based on the analysis in Section 4.2.3, there is almost no potential for adverse effects on nontarget wildlife because of ORV bait consumption under any scenario involving the distribution of baits containing the V-RG vaccine.

##### **4.1.3.2 Effects of Capture/Removal Methods (Used in Monitoring and Surveillance or to Reduce Local Populations of Target Species under State Contingency Plans) on Nontarget Species, including Threatened or Endangered Species.**

Under the no action alternative, the potential for APHIS-WS assistance to result in adverse impacts on nontarget wildlife on National Forest System lands would be zero. However, states could still conduct ORV programs and monitoring that include the capture and/or killing of wild animals for monitoring purposes or localized depopulation under contingency plans. The potential effect on nontarget wildlife and T&E species from methods used in monitoring and surveillance programs would be less than the proposed action; however, effects of the proposed action would be insignificant.

#### **4.1.4 Potential for Adverse Effects on Pet Dogs or Other Domestic Animals that Might Consume the Baits.**

Under the no action alternative, the potential for APHIS-WS assistance to result in adverse impacts on domestic pets or other domestic animals on National Forest System lands would be zero. However, states could still conduct ORV programs, but such programs would probably be on a reduced scale without APHIS-WS participation. Based on the analysis in Section 4.2.4, there is almost no potential for adverse effects on domestic animals because of ORV bait consumption under any scenario involving the distribution of baits containing the V-RG vaccine. On the other hand, failure to stop or prevent the spread of rabies would result in adverse effects on domestic animals by increasing their likelihood of exposure to rabid wild animals.

#### **4.1.5 Potential for the Recombined V-RG Virus to "Revert to Virulence" and Result in a Virus that could Cause Disease in Humans or Animals.**

Under the no action alternative, ORV baits with the V-RG vaccine would probably still be used by the states on National Forest System lands even without APHIS-WS participation, although such use would likely be on a reduced scale. As shown by the analysis in Section 4.2.5, the potential for serious environmental effects with regard to this issue is negligible.

#### **4.1.6 Potential for the V-RG Virus to Recombine with Other Viruses in the Wild to Form New Viruses that could Cause Disease in Humans or Animals.**

Under the no action alternative, ORV baits with the V-RG vaccine would probably still be used by the states on National Forest System lands even without APHIS-WS funds, although such use would likely be on a reduced scale. As shown by the analysis in Section 4.2.6, the potential for

serious environmental effects with regard to this issue is negligible.

#### **4.1.7 Potential for Aerially Dropped Baits to Strike and Injure People or Domestic Animals.**

Under the no action alternative, there would be no potential for APHIS-WS involvement to result in or increase this risk on National Forest System lands. States could still implement ORV programs, but such programs would probably be conducted on a lesser scale without APHIS-WS funds. As discussed in Section 4.2.7, the risk of persons or animals being struck by ORV baits is extremely remote.

#### **4.1.8 Cost of Raccoon ORV Programs in Comparison to Perceived Benefits.**

Under the no action alternative, APHIS-WS baiting programs would be conducted around the National Forest System lands located within ORV zones. State-run programs could still conduct ORV programs on National Forest System lands in the absence of APHIS-WS participation. Without APHIS-WS assistance, such programs would probably be conducted on a reduced scale, if at all, and may be less successful in stopping the forward advance of the three rabies variants across much of the U.S. Overall program costs would decline, but benefits, in terms of avoided costs (described in Section 4.2.8), would also decline with the most likely result being greatly increased state and private costs to monitor and vaccinate for rabies across large areas of the U.S. It is believed that, based on the analysis in Section 4.2.8, the increased state and private costs resulting from failure to stop the spread of the rabies variants would exceed by a substantial margin the savings in program costs that would occur by implementing the no action alternative. Thus, the benefit:cost ratio of this alternative would be expected to be much less (i.e., less desirable) than that of the proposed action.

#### **4.1.9 Humaneness of Methods Used to Collect Wild Animal Specimens Critical for Timely Program Evaluation or to Reduce Local Populations of Target Species under State Contingency Plans.**

Under the no action alternative, APHIS-WS would not assist in collecting wild animal specimens on National Forest System lands for ORV monitoring programs or for local population suppression efforts under contingency plans to address local rabies outbreaks beyond ORV barriers. States would still most likely conduct such programs on their own, although to a lesser degree without APHIS-WS personnel. The primary method that would be used by APHIS-WS to capture raccoons (cage traps) would also most likely be the primary method used by state programs, although possibly to a lesser degree. Thus, some persons would view this as being a more humane alternative because of the lower intensity of use of the methods used.

Failure of a successful ORV program would likely result in an increased, but varying, proportion of raccoon and other wild mammal species populations succumbing to rabies when exposed to the rabies virus. The symptoms of rabies include insomnia, anxiety, confusion, slight or partial paralysis, excitation, hallucinations, agitation, hypersalivation, difficulty swallowing, and hydrophobia (fear of water) (CDC 2001a). Some persons might argue that dying from rabies, which can take several days once symptoms appear, results in more animal suffering than being captured or killed by monitoring and surveillance activities. In any event, it is almost certain that much larger numbers of animals would succumb to rabies without effective ORV programs than would experience stress and suffering from being captured or killed by monitoring activities. The numbers dying of rabies could become huge as epizootics of specific strains spread across larger areas of the U.S. With this in mind, it would appear that, on balance, the implementation of successful ORV programs that include animal collections for monitoring results in less animal suffering than taking no action.

- 4.2 **Alternative 2 -- Proposed Action (Provide APHIS-WS funds to purchase and participate in the distribution of ORV baits on National Forest System lands in several states; assist in monitoring, surveillance and project evaluation by capturing and releasing or killing target species of carnivores for the collection of blood serum, biomarker and other biological samples; potentially assist in implementing contingency actions that include localized lethal population reduction of target species or concentrated localized ORV baiting).**

**4.2.1 Potential for Adverse Effects on People that Become Exposed to the Vaccine or the Baits.**

Direct tests of the safety of V-RG in humans have not been conducted, for understandable reasons. Prior EAs by APHIS have analyzed in detail the potential for adverse effects on humans from V-RG exposure as a result of ORV experimental programs (USDA 1991, 1992, 2001, 2003).

**4.2.1.1 Potential to Cause Rabies in Humans.**

The nature of the recombinant virus used as the V-RG vaccine is such that it cannot cause rabies. This is because the V-RG vaccine only carries the gene for producing the outer coating of the rabies virus (i.e., rabies virus *glycoprotein*) and not those portions of the virus that could result in replication of the rabies virus which would have to happen for the disease to occur.

Implementation of the ORV program would reduce the risk of humans contracting rabies by reducing the chance of encountering rabid animals that have been infected by the raccoon variant of the disease. The proposed action would most likely result in less risk of human exposure to rabies than the no action alternative.

**4.2.1.2 Potential for Vaccinia Virus to Cause Disease in Humans.**

The vaccinia virus portion of the V-RG vaccine has been recognized as having the potential to cause infections in persons exposed to the vaccine, either through direct contact with the liquid or through contact with the mouth of an animal that has recently ingested the oral vaccine (USDA 1991, p. 39). Because the vaccinia virus used in the V-RG vaccine is the same type of virus that was used in smallpox eradication, although more *attenuated* or weakened, persons who have been immunized against smallpox would likely not experience any adverse reaction to the vaccinia virus, but would likely experience at worst a "booster" in immunity against vaccinia virus. However, the routine administration of smallpox vaccinations was discontinued after smallpox was eradicated. Thus, a large percentage of the population (particularly younger individuals) has not been vaccinated against vaccinia. Vaccinia virus rarely poses much risk of serious health effects — even when it was *directly applied* (via "scarification" or by scratching the skin) to many hundreds of millions of people during smallpox eradication campaigns, the number that developed vaccinia virus-related illness was only a few per million. In most of those cases the extent of the illness was a mild fever and some lesions or pustules at the site of the injection, followed by full recovery and subsequent immunity to the vaccinia virus (USDA 1991, p. 39; Elvinger 2001). In most people, localized lesions occurred around the site on the arm where the smallpox vaccine was applied, but this a normal and expected response and, in general, no cause for concern.

More severe complications involving the central nervous system (CNS) can occur with vaccinia virus and are generally thought to be allergic in nature (USDA 1991, p. 39). CNS complications occurred at an average rate of 3 per million among persons vaccinated with vaccinia virus (e.g., to prevent smallpox) with about 10 to 30% of those cases resulting in death (USDA 1991, p. 39). Thus, the chance of a person dying from direct application of a high dose of vaccinia virus via scarification would be about 1 in a million cases or less. With ORV baits distributed in the wild, people would run far less

risk of being exposed to vaccinia virus or the V-RG vaccine in a way similar to deliberate smallpox vaccinations, but would primarily only run the risk of skin contact by handling broken baits or coming into contact with the oral regions of pets that had just consumed a bait. For that type of exposure, the chance of adverse effects from human infection with vaccinia virus would be far less than 1 in a million.

Another highly important characteristic of the V-RG vaccine is that it is weaker (more "attenuated") than the original parent vaccinia strain used in making it, and this has been proven in laboratory tests with mice (USDA 1991, p. 18-19). This characteristic even further reduces the risk of V-RG vaccine causing vaccinia-related illness in humans. However, persons with immune system deficiencies (e.g., AIDS) run a relatively greater risk of experiencing adverse effects if directly exposed to the vaccinia virus than would persons with normal immune systems (USDA 1991, p. 40; USDA 1995a; USDA *undated a, undated b*). Experiments in mice suggest that immune-deficient people would be at minimal risk of adverse effects when exposed to V-RG vaccine (Hanlon et al. 1997; USDA 1991, p. 41 and Appendix E therein). To aid in further minimizing the potential for adverse effects on humans because of contact with V-RG vaccine, each ORV bait contains a warning label advising persons who make contact with baits or the vaccine liquid to contact officials. A telephone number is provided on the bait for further guidance.

An indirect source of information on this issue is the safety record of laboratories that have worked with the V-RG vaccine (USDA 1991, p. 27). Ordinarily, lab personnel working with infectious materials or animals are protected by immunization and by procedures and equipment that minimize risk. V-RG vaccine has been completely safe for humans in laboratory situations (USDA 1991, p. 27). Potential nonlaboratory exposure of humans in the various European field trials of V-RG vaccine has been considerable, with no program in place that monitors antibody levels of residents before and after the field trials. However, there have not been any reports of increased incidence of sickness in the field trial areas that could be attributable to the V-RG vaccine (USDA 1991, p. 27; G. Moore, TX Dept. of Health, pers. comm. 2001).

Studies of the effects of V-RG vaccine on nonhuman primates can provide an indication of the potential to affect humans (USDA 1991, p. 27). Studies in which squirrel monkeys (*Saimiri sciureus*) and chimpanzees (*Pan troglodytes*) were inoculated with the V-RG vaccine demonstrated that indirect human exposure to the vaccine that might occur via a bite or from contact with body fluids of a recently vaccinated animal is unlikely to produce adverse effects in healthy individuals (Rupprecht et al. 1992a; USDA 1991, p. 27).

McGuill et al. (1998) conducted a retrospective 4-year survey of directors of 5 ORV programs using V-RG vaccine that were conducted from 1992-1996 to evaluate the potential for human health problems. The programs occurred in Florida, Massachusetts, New Jersey, New York, and Texas. Altogether, they involved a total of 109,276 sq km (42,181 sq miles) of treated area and a total of nearly 6 million baits distributed. Human contacts with the baits totaled 316, of which 53 resulted in contact with the actual vaccine liquid. The directors of all programs reported that human contact was minimal and that there were no reported adverse reactions in people exposed to the baits. Human contact with the baits was more likely in areas where bait had white labels vs. lettering in black ink, and the authors speculated the reason to be because the white labeled baits were more visible and thus more likely to be noticed. The authors concluded that, based on their survey, major concerns about public health risks from V-RG vaccine were unfounded.

Out of millions (more than 51 million in the U.S.) of baits that have been dropped during the ORV program thus far, only one case of adverse reaction from contact with the



vaccine has been reported (USDA 2001, USDA 2003a). The case occurred in Ohio when a woman was bitten by her dog while trying to take away an ORV bait. The vaccine liquid was exposed to the bite area, resulting in localized inflammation and pox virus lesions at the site of the bite, as well as a whole body rash. She further experienced sloughing of the outer layers of skin from some portions of her body, similar to what occurs in the skin condition eczema (C. Rupprecht, CDC, pers. comm. 2001). The woman, who was in her first trimester of pregnancy, is reported to have recovered from complications and gave birth to a 10-lb. baby boy with no apparent adverse health effects (R. Krogwold, OH Dept. of Health, pers. comm. 2001). Most recent reports attribute her response to the vaccinia virus as due likely to the reduced state of immunity typical during pregnancy and an underlying skin disorder (epidermolytic hyperkeratosis) that the woman already had (C. Rupprecht, CDC, pers. comm. 2001). The woman also tested positive for rabies antibodies three weeks after the exposure, indicating she may also have developed rabies immunity (Rupprecht et al. *unpublished* 2001, Rupprecht et al. 2001). This type of incident appears to be unusual, but, nevertheless, points to the need for continued public information and education activities and field surveillance for accidental human exposure to the V-RG virus.

Recent bait exposure information during an ORV project in eastern PA (August-September, 2002) revealed that out of 1,283,521 baits distributed over approximately 16,755 sq. km, 67 humans or pets were exposed to a bait. This equates to 0.005 percent of distributed baits being found by pets or people. In at least 42 of the 67 exposure cases, the household pet (dog or cat) found the bait; however, the bait and sachet or sachet alone was normally still intact (at least 72% of cases). Of the 8 cases where the sachet was ruptured, pets or humans did not experience the development of an adverse reaction (i.e., lesions) (O'Reilly, CDC, pers. comm. 2002). This ORV project involved bait distribution in several urban areas. Therefore, pets and other domestic animals were more likely to find the baits and are the primary source for potential and human exposure to ORV baits. Most ORV baiting locations occur over rural or undeveloped lands where human exposure cases can be expected to be much lower. Additionally, out of 26.5 million baits disbursed since APHIS-WS program inception, only 288 people reported contact with a bait (0.0011% contact cases or 1 human exposure/91,971 baits distributed). Most exposure cases involved an intact bait. Very few cases involved touching a broken bait, sachet, or the liquid vaccine. Of the 288 contact cases reported since APHIS-WS ORV program inception (1995), only the 1 known, previously discussed, adverse reaction has occurred (USDA 2001, USDA 2003a, USDA 2003b).

Although there is no approved anti-viral compound available yet for treatment of suspected vaccinia virus complications, the CDC can make vaccinia immune globulin available to the state on a case-by-case basis, with a requirement that certain specimens (such as acute and convalescent sera and swabs/scabs of the affected site) be collected for diagnosis (C. Rupprecht, CDC, pers. comm. 2001). This option provides some level of additional assurance that severe adverse effects on humans from vaccinia virus reactions would be successfully treated to avoid significant public health problems.

A recent study indicates vaccinia virus that originated from a strain used in smallpox vaccinations in Brazil may have become established in domestic cows in that country (Damaso et al. 2000). This indicates there is some potential for the use of vaccinia virus to result in a new emerging infectious disease. There is currently no evidence that this type of phenomenon has occurred in the U.S. (C. Rupprecht, CDC, pers. comm. 2001). Also, the vaccinia virus strain used for smallpox vaccination in Brazil was different than the strain that is currently used in the V-RG vaccine, and the vaccinia virus portion of V-RG is more attenuated (i.e., *weaker*) than the strains used in smallpox vaccines (USDA 1991, p. 18-19). Thus, it is less likely that V-RG vaccine would result in the establishment and persistence of vaccinia virus in wild or domestic animals. However, no surveillance or testing of animals for this virus has been done in the U.S. to test this

hypothesis (C. Rupprecht, CDC, pers. comm. 2001).

The above information shows there is some potential for unusual circumstances to result in short-term adverse health effects from exposure to the vaccinia virus in the V-RG vaccine. However, the overall risk of such effects appears to be negligible based on the extremely low rate of reported occurrences in ORV programs. The potential risk for vaccinia-related disease cases would be higher than the no action alternative. However, the likelihood that any cases would occur is extremely remote under any expected scenario involving the distribution of ORV baits.

#### **4.2.1.3 Potential to Cause Cancer (Oncogenicity).**

This issue has been addressed in a previous EA and in formal risk analyses (USDA 1991, p. 40; USDA *undated a, undated b*). Vaccinia virus is not known to be a tumor-inducing virus. There have been no documented reports of oncogenicity associated with natural vaccinia virus infections in any animal species. The recombinant DNA methods used for preparation of the V-RG vaccine do not introduce any known oncogenes (i.e., cancer-causing genes) into the vaccinia virus strain that could cause it to become tumor-inducing.

Based on this information, risks to humans from contact with the V-RG vaccine are believed to be minimal. The risk and potential severity of adverse effects from rabies exposures in humans would probably be greater without ORV programs than would be the risk of serious adverse effects from vaccinia virus infections with ORV programs.

#### **4.2.2 Potential for Adverse Effects on Target Wildlife Species Populations.**

##### **4.2.2.1 Effects of the ORV V-RG Vaccine on Raccoons.**

The primary concern here is whether the V-RG virus might cause disease in target animals that consume the ORV baits. Large numbers of raccoons have been inoculated with, or have consumed baits containing, the vaccine without ill effects, and most were successfully immunized against rabies (USDA 1991, p. 25; Rupprecht et al. 1988). Tests showed that the V-RG virus did not invade the CNS or the cerebrospinal fluid of treated raccoons which indicated no adverse effects on the CNS are likely (USDA 1991, p. 25; Hanlon et al. 1989b). Other tests showed that the V-RG vaccine did not cause any lesions or viremia (i.e., presence of the virus in the blood) in tissues sampled from treated raccoons (Rupprecht et al. 1988). These studies, in addition to the absence of reports of adverse effects in free-ranging wildlife in current/historical ORV program areas, have demonstrated the safety and effectiveness of the V-RG vaccine in raccoons.

ORV baits containing the V-RG vaccine would thus have no adverse impact on raccoon populations (same as no action alternative). Implementation of an ORV program would likely have a beneficial impact to raccoons by reducing the occurrence of the raccoon variant of the rabies virus in the wild. The beneficial impact to raccoon populations would be greater than the no action alternative.

##### **4.2.2.2 Effects of Monitoring/Surveillance or Localized Population Reduction (Contingency Actions) on Raccoon Populations in Eastern States.**

The estimated cumulative size (over all involved states and including National Forest System lands) of the proposed raccoon rabies ORV barrier zones to be treated with ORV baits purchased with USDA funds in any one year would be about 102,650 sq km (or about 39,623 square miles) (Kemere et al. 2001). Raccoon densities range from 0.9 to as high as 250 per sq km. (about 2 to 650 per sq mi.) with most reported densities in the range of about 4 to 30 per sq km. (about 10 to 80 per sq mi.) in rural areas (Riley et al.

1998). Assuming this range of densities occurs in the proposed ORV zones, it is reasonable to assume that overall raccoon numbers in those areas total between 400,000 and 3.1 million.

Raccoon populations can generally be expected to withstand harvest rates of about 49% or more annually (Sanderson 1987; USDA 1997j). APHIS-WS and cooperating state or local agencies expect to continue to live-trap or lethally remove less than 1% of the lowest estimated number of raccoons in all states combined for monitoring and surveillance purposes or implementation of localized contingency plans involving lethal population reduction. The FY 2001 Monitoring Report for the 2001 EA – Oral Vaccination to Control Specific Rabies Virus Variants in Raccoons, Gray Foxes, and Coyotes in the U.S. (USDA 2003b) indicates the lowest estimated size of the raccoon population in those states participating in the ORV program is 354,846 raccoons. The APHIS-WS program killed 689 raccoons for enhanced rabies surveillance as a part of cooperative ORV efforts or 0.19% of the total lowest estimated population in FY 2001. The report summarizes the ORV program continues to have no adverse impacts to raccoon densities and that, in the absence of the ORV program, it is highly likely that far more raccoons would die from rabies than are killed for surveillance and monitoring purposes to critically evaluate the integrity of ORV campaigns.

Almost all raccoons captured for monitoring or surveillance purposes would be released at their site of live capture once they have fully recovered from anesthesia. In most instances, only strange behaving individuals would be humanely killed and submitted for rabies testing. An exception may be when the animals were captured and drugged for handling purposes close to or during hunting/trapping seasons, at which times they may be euthanized to avoid concerns about hunters or trappers consuming raccoons that contain drug residues (see Section 2.2.1). Contingency actions may be considered that could result in lethal raccoon population suppression in small areas to attempt to contain an outbreak that could occur beyond an existing ORV zone. Given that hunter and trapper harvest and other sources of mortality would occur, there are no anticipated significant cumulative impacts to raccoon populations even if contingency actions would be infrequently conducted in small areas of the states involved in ORV programs. Thus, the potential for adverse effects of monitoring and surveillance or localized population reduction on raccoon populations can be considered slightly higher than the no action alternative, but still negligible.

#### **4.2.3 Potential for Adverse Effects on Nontarget Wildlife Species, including Threatened or Endangered Species.**

##### **4.2.3.1 Effects of the RABORAL V-RG® Vaccine on Nontarget Wildlife including Threatened or Endangered Species.**

The primary concern here is whether the vaccinia virus-rabies glycoprotein combination (i.e., RABORAL V-RG® vaccine) might cause disease in nontarget animals that consume or otherwise come into contact with the vaccine in baits. Rupprecht et al. (1992a) and Pastoret et al. (1995) summarized the results of V-RG safety trials in nontarget species. More than 50 species from Europe and North America have been tested and include relevant taxonomic groups believed to be potentially at risk for contact with the V-RG vaccine such as:

- Natural ecological competitors of raccoons and foxes, such as the opossum (*Dedelphis virginianus*), several mustelids [skunk, badger, mink (*Mustela vison*), otter (*Lutra canadensis*), ferret (*Mustela putorius*)], other members of the Canid family [coyote, red fox, gray fox, arctic fox (*Alopex lagopus*), raccoon dog (*Nyctereutes procyonoides*)], bobcat (*Lynx rufus*), and black bear (*Ursus americanus*).

- Domestic cats (*Felix domesticus*) and dogs (*Canis familiaris*).
- 19 rodent species (Order *Rodentia*) that might be expected to gnaw on or consume baits. Families within this order represented in the studies included: *Muridae*, *Erethizonidae* [porcupine (*Erethizon dorsatum*)], *Sciuridae*, *Cricetidae*, and *Zapodidae*.
- 1 bat species [Daubenton's bat (*Myotis daubentoni*)].
- 8 bird species, including three hawk species [red-tailed hawk (*Buteo jamaicensis*), kestrel (*Falco tinnunculus*), common buzzard (*B. Buteo*)], and one species each of owl [great horned owl (*Bubo virginianus*)], crow [carrion crow (*Corvus corone*)], gull [ring-billed gull (*Larus delawarensis*)], magpie (*Pica pica*), and jay (*Garrulus glandarius*).
- Domestic livestock [cattle (*Bos taurus*), sheep (*Ovis ovis*)].
- Two wild ungulate species [wild boar (*Sus scrofa*), white-tailed deer (*Odocoileus virginianus*)].
- Two primate species (squirrel monkey and chimpanzee).

Rupprecht et al. (1992a) reported there has been no mortality or morbidity (i.e., signs or symptoms of disease) and no lesions typical of pox virus infections caused by V-RG vaccine in over 350 individual animals representing some 20 taxonomic families of animals. They concluded that the extensive laboratory safety experiments showed V-RG to be safe in all species tested to date. In field trials with V-RG ORV baits to treat wild raccoons in which target and nontarget species were captured and tested, no vaccine-related lesions or other adverse effects have been found to occur (Rupprecht et al. 1992a). The ORV program may, instead, actually reduce the likelihood of wildlife being exposed to the rabies virus. Additionally, the Texas Department of Health (2002) concluded in their 2001 Texas Gray Fox After Action Report that none of the 52 nontarget species (16 coyotes, 3 bobcats, 29 raccoons, 1 red fox, and 1 ringtail) captured within the Texas vaccination zones demonstrated lesions attributable to the vaccine. Other nontargets observed during monitoring and surveillance activities within the vaccination zone had no indication of adverse reaction to the ORV baits.

There is no evidence of potential harm to target or nontarget species from overdosage of RABORAL V-RG® vaccine by any route or from multiple doses. A number of nontarget species have been dosed with 2 to 10 times the amount of vaccine in an individual ORV bait without adverse effects (USDA 1991, p. 47; Rupprecht et al. 1992a). Therefore, even if domestic animals received multiple doses of vaccine by consuming multiple baits, no adverse effects would be expected to occur.

The RABORAL V-RG® vaccine would not adversely affect any non-warm blooded animal species. The vaccinia virus and other orthopoxviruses do not replicate or reproduce themselves in non-warm blooded species (Rupprecht, CDC, pers. comm. 2002). Therefore, ORV is not expected to cause any adverse effects on fish, reptiles, amphibians, or any invertebrate species should any members of these species groups consume or otherwise be exposed to the vaccine.

The RABORAL V-RG® vaccine distributed in baits would have no adverse effects on any state or federally listed threatened or endangered species or their critical habitats (see Appendices C and D for species lists) and USFS Regional Forester Sensitive Species

(Regions 8 and 9) (see Appendix I). Few listed species would be likely to be attracted to the ORV baits, and the few carnivore species that might consume baits would be expected to experience no effect other than possibly becoming immunized against rabies. Thus, beneficial effects of the vaccine on nontarget species would be greater than the no action alternative. Based on the above analysis, there is almost no potential for adverse effects on nontarget wildlife because of ORV bait consumption (same as no action alternative).

#### **4.2.3.2 Effects of Capture/Removal Methods (Used in Monitoring and Surveillance or to Reduce Local Populations of Target Species under State Contingency Plans) on Nontarget Species, including Threatened or Endangered Species.**

The methods proposed for use in raccoon rabies monitoring and surveillance areas or in implementing localized population reduction under state contingency actions would have no significant adverse effects on nontarget species. Nontarget animals captured in cage traps would normally be released unharmed unless lethal removal was requested by the cooperating landowner or if the animal appeared injured or sick. Therefore, monitoring and surveillance should have no effect on nontarget species populations.

The FY 2001 Monitoring Report for the 2001 EA – Oral Vaccination to Control Specific Rabies Virus Variants in Raccoons, Gray Foxes, and Coyotes in the U.S. (USDA 2003b) indicates that nontarget populations were not adversely affected by APHIS-WS actions in FY 2001. Occasionally, nontarget wildlife species were captured during ORV monitoring and surveillance efforts. Most species were captured in cage traps and released unharmed. A few individual animals were euthanized after being caught in cage traps, mainly if they were demonstrating strange behavior consistent with symptoms of rabies, were injured, were killed intentionally to address damage reported by the cooperating landowners at their request, or were intentionally lethally removed by other means for rabies testing. The nontargets killed intentionally (10 opossums, 7 skunks, 5 groundhogs, 2 coyotes, 2 woodchucks, 2 red squirrels, 1 gray squirrel, 1 gray fox, 1 feral cat, 1 feral dog, 1 rabbit) were not considered to be from low density populations and removal would not be expected to have any cumulative adverse effects on populations in the area (USDA 2003b). No T&E species were adversely affected by APHIS-WS actions in FY 2001 (USDA 2003b). One state-endangered river otter was captured in a cage trap during Ohio ORV surveillance activities, but was released unharmed in accordance with the direction of the Ohio Division of Wildlife. APHIS-WS concluded in the monitoring report (USDA 2003b) that the cumulative impact on nontarget species is negligible to nonexistent and that APHIS-WS has not adversely affected the viability of any wildlife species populations.

APHIS-WS reviewed lists of federal and state T&E species (Appendices C and D) and USFS Regional Forester Sensitive Species (Regions 8 and 9) (Appendix I) to determine if any might be affected. ORV programs or the methods used in capture/removal of target species in monitoring activities or contingency plan implementation would have no effect on any listed bird, reptile, amphibian, fish, invertebrate, or plant species. The only species on the federal or state T&E or special status lists that might be expected to raise concerns about potential effects from the proposed action are:

#### **Federally Listed T&E Species:**

- **Canada lynx** (*Lynx canadensis*). This species is shown to potentially occur in portions of New York, Pennsylvania, New Hampshire, Maine, and Vermont among the states involved in the proposed action). The USFWS has documentation that lynx occur and are reproducing in Maine and therefore believes that lynx could possibly disperse to contiguous suitable habitat in New Hampshire, but consider lynx occurrence as rare in New Hampshire based on recent records (USDI 2000).

Furthermore, the USFWS considers it possible that lynx have been extirpated from New Hampshire, Vermont and New York (USDI 2000). The USFWS has concluded that, in the Northeast, a population of lynx most likely continues to exist in the core region of western Maine, northern New Hampshire, southeastern Quebec, and western New Brunswick; however, the range appears to have retracted northward (USDI 2000). Based on a review of past capture records, APHIS-WS has determined there to be no risk to lynx from ORV programs, from rabies monitoring or surveillance (including the capture and testing of raccoons) or other current APHIS-WS activities in these states (USDA 2000). Also, lynx are not expected to be attracted to or to consume ORV baits and would thus not be affected by them. Therefore, APHIS-WS has determined that the proposed action would have no effect on this species. A potential beneficial indirect impact of ORV programs on lynx conservation would be a reduced risk of contracting and dying of rabies if the spread of raccoon rabies is successfully halted or if the variant strain is eradicated.

- **Eastern puma** (*Puma concolor cougar*). This species is designated as endangered in its entire historical range (Connecticut, District of Columbia, Delaware, Illinois, Indiana, Kentucky, Massachusetts, Maryland, Maine, Michigan, North Carolina, Georgia, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, South Carolina, Tennessee, Virginia, Vermont, and West Virginia). The Eastern puma is presumed extinct in the wild; however, some unconfirmed sightings have been reported in Minnesota and Michigan recently (<http://endangered.fws.gov/>). In addition, a number of unverified sightings have been reported in the Southeast Region in North Carolina (including the Nantahala National Forest, Great Smoky Mountain National Park, the northern portion of the Uwharrie National Forest, and the State's southeastern counties). The USFWS and USFS jointly completed a 5-year survey in an attempt to determine the presence of self-sustaining cougar populations in the southern Appalachian Mountains from Virginia to Northern Georgia. No concrete evidence was ever obtained for the existence of eastern cougar populations (per <http://endangered.fws.gov/>). This species has been extirpated from White Mountain, Wayne, Monongahela, Allegheny, and Green Mountain National Forests. It is not known to exist on any other forests listed under the proposed action of this document. This species is not expected to be attracted to or to consume ORV baits. Also, animals the size of cougars would not be affected by cage-traps used to collect raccoons for monitoring purposes. Therefore, ORV programs, including monitoring activities involving the live-capture or lethal removal of raccoons, would have no effect on this species. A potential beneficial indirect impact of ORV programs on this species would be a reduced risk of contracting and dying of rabies if the spread of raccoon rabies is successfully halted or if the variant strain is eradicated.
- **Florida panther** (*Puma concolor coryi*). This subspecies of cougar occurs in Florida (including the Ocala National Forest), and it is not expected to be attracted to or to consume ORV baits. Also, animals the size of cougars would not be affected by cage-traps used to capture raccoons for monitoring purposes. Therefore, ORV programs, including monitoring activities involving the live-capture or lethal removal of raccoons, would have no effect on this species. A potential beneficial indirect impact of ORV programs on this species would be a reduced risk of contracting and dying of rabies if the spread of raccoon rabies is successfully halted or if the variant strain is eradicated.
- **Gray wolf** (*Canis lupus*). **Eastern Distinct Population Segment (DPS) of the gray wolf.** On April 1, 2003 this segment of the gray wolf population was reclassified as threatened (previously considered endangered under the ESA). The Eastern gray wolf DPS encompasses the historical range of the gray wolf from the Great Plains to the Atlantic Coast. Due to the successful gray wolf recovery in Minnesota,

Wisconsin, and Michigan, this DPS is now classified as Threatened. The gray wolf has been extirpated from White Mountain, Wayne, Monongahela, Allegheny, and Green Mountain National Forests where it once existed. Animals the size of wolves would not be affected by cage traps used to capture raccoons for monitoring purposes. The small size of the cage traps, trap placement, bait type, and prebaiting techniques used for monitoring and surveillance activities should preclude the capture of these species. A potential beneficial indirect impact of ORV programs would be a reduced risk of contracting and dying of rabies if the spread of raccoon rabies is successfully halted or if the raccoon variant strain is eradicated.

- **Red wolf** (*Canis rufus*). The historic range of the red wolf occurred throughout the southeastern U.S. from the Atlantic Coast to central Texas and from the Gulf of Mexico to central Missouri. Red wolves are listed as endangered in Florida, North Carolina and South Carolina. However, red wolves are now considered to be extinct in the wild except for experimental populations in Tennessee and North Carolina. Currently 16 wolves are located in the Great Smoky Mountains National Park in Tennessee. No red wolves are currently known or believed to exist outside this park. Therefore, ORV bait distribution on National Forest System lands would have no effect on this species. Should the park unit be baited in the future, a potential beneficial indirect impact of ORV programs on this species would be a reduced risk of the species suffering further declines because of a rabies epizootic.
- **Delmarva fox squirrel** (*Sciurus niger cinereus*). This species is listed as endangered in Delaware, Maryland, and Virginia. It is conceivable that this species could consume ORV baits intended for raccoons. Although not specifically tested for safety in this species, safety studies on other closely related rodent species (Rupprecht et al. 1992a) indicate fox squirrels would not be adversely affected. Also, an indirect beneficial effect would be a reduced risk of the species suffering further declines because of a rabies epizootic. If a Delmarva fox squirrel was inadvertently captured in a cage trap set for a raccoon, it would be released unharmed to avoid lethal take and reported to the appropriate wildlife agency. Therefore, the proposed action should have no significant impact on this species.

#### State listed species:

- **American marten** (*Martes americana*). This species is state-listed as threatened in New Hampshire and endangered in Vermont. It is known to inhabit the White Mountain National Forest in New Hampshire. It is conceivable that this species could consume ORV baits intended for raccoons. Although not specifically tested for safety in this species, safety studies on other closely related Mustelid species (skunk, mink, badger, ferret, otter) (Rupprecht et al. 1992a) indicate martens would not be adversely affected. Also, an indirect beneficial effect would be a reduced risk of the species suffering further declines because of a rabies epizootic. If a pine marten was inadvertently captured in a cage trap set for a raccoon, it would be released unharmed to avoid lethal take and reported to the appropriate state agency to complement their population monitoring data for this state-listed species. Therefore, the proposed action should have no significant impact on this species.
- **Everglades mink** (*Mustela vison evergladensis*). This species is state-listed as threatened in Florida. It is conceivable that this species could consume ORV baits intended for raccoons; however, populations of this species inhabit the Everglades in southern Florida and ORV program activities are not proposed for that portion of the state. Safety studies on Mustelid species (Rupprecht et al. 1992a) indicate the mink would not be adversely affected. Also, an indirect beneficial effect would be a reduced risk of the species suffering further declines because of a rabies epizootic. If a least weasel was inadvertently captured in a cage trap set for a raccoon, it would be released unharmed to avoid lethal take and reported to the appropriate state agency to

complement their population monitoring data for this state listed species. Therefore, the proposed action should have no significant impact on this species.

- **Bobcat** (*Lynx rufus*). The bobcat is state-listed as endangered in Ohio and New Jersey. The bobcat inhabits the Wayne, White Mountain, Monongahela, Allegheny, and Green Mountain National Forests where it is also listed as a Regional Forester Sensitive Species. ORV baits distributed for raccoons would not adversely affect this species (Rupprecht et al. 1992a). It is considered highly unlikely that bobcats would be caught in cage traps set for raccoons during monitoring or local population suppression activities. However, if a bobcat is caught unintentionally, it would be released unharmed per the appropriate state wildlife agency. An indirect beneficial effect would be a reduced risk of these species suffering further declines in the state because of a rabies epizootic.
- **River Otter** (*Lutra canadensis*). The river otter is state-listed as endangered in Ohio and Florida and threatened in Tennessee. The river otter inhabits the Wayne National Forest in Ohio. ORV baits distributed for raccoons would not adversely affect this species (Rupprecht et al. 1992a). It is considered highly unlikely that river otters would be caught in cage traps set for raccoons during monitoring or local population suppression activities (although one river otter was captured and released unharmed in FY 2001, discussed previously). The APHIS-WS program in Ohio has a scientific collecting permit from the Ohio Department of Natural Resources, Division of Wildlife (ODOW). The ODOW has advised APHIS-WS to release any nontargets captured. If any captures occurred they would be reported to ODOW to complement their population monitoring data for these state-listed species. By following these measures, APHIS-WS should avoid any lethal take of these species. An indirect beneficial effect would be a reduced risk of these species suffering further declines in the state because of a rabies epizootic.
- **Snowshoe hare** (*Lepus americanus*). This species is state-listed as endangered in Ohio and has been recently reintroduced into the state (A. Montoney, APHIS-WS, pers. comm. 2001). ORV baits should have no effect on this species. It is highly unlikely that any snowshoe hares would be captured incidentally during rabies monitoring or local raccoon population suppression activities. As stated above, the Ohio APHIS-WS program has a scientific collecting permit from the ODOW and has been advised to release any nontargets captured. If any captures occurred they would be reported to ODOW to complement their population monitoring data for this state-listed species. By following these measures, APHIS-WS should avoid any lethal take of this species. Also, an indirect beneficial effect would be a reduced risk of the species contracting and dying of rabies.
- **New England cottontail** (*Sylvilagus transitionalis*). This species is state-listed as being of "special concern" in Vermont. The New England cottontail can be found on the Chattahoochee National Forest in Georgia. That status confers no specific protection for the species. Although unlikely, one could conceivably be captured in a cage trap set for raccoons. Any caught would be released unharmed and reported to the Vermont Department of Fish and Wildlife, which would avoid any significant impacts on the species. Also, an indirect beneficial effect would be a reduced risk of the species contracting and dying of rabies.
- **Least weasel** (*Mustela nivalis*). This species is state-listed as a species of concern in Kentucky. The least weasel can be found on the Chattahoochee National Forest in Georgia. It is conceivable that this species could consume ORV baits intended for raccoons. Although not specifically tested for safety in this species, safety studies on other closely related Mustelid species (skunk, mink, badger, ferret, and otter) (Rupprecht et al. 1992a) indicate weasels would not be adversely affected. Also, an



indirect beneficial effect would be a reduced risk of the species suffering further declines because of a rabies epizootic. If a least weasel was inadvertently captured in a cage trap set for a raccoon, it would be released unharmed to avoid lethal take and reported to the appropriate state agency to complement their population monitoring data for this state listed species. Therefore, the proposed action should have no significant impact on this species.

- **Round-tailed muskrat** (*Neofiber alleni*). This species is state-listed as threatened in Georgia. It also inhabits the Ocala National Forest in Florida and is considered a Regional Forester Sensitive Species by the USFS. It is conceivable that this species could consume ORV baits intended for raccoons. Although not specifically tested for safety in this species, safety studies on other closely related rodents (Rupprecht et al. 1992a) indicate muskrats would not be adversely affected. Also, an indirect beneficial effect would be a reduced risk of the species suffering further declines because of a rabies epizootic. If a round-tailed muskrat was inadvertently captured in a cage trap set for a raccoon, it would be released unharmed to avoid lethal take and reported to the appropriate state agency to complement their population monitoring data for this state listed species. Therefore, the proposed action should have no significant impact on this species.
- **Eastern spotted skunk** (*Spilogale putorius*). This species is state-listed as a species of concern in Kentucky. It is conceivable that this species could consume ORV baits intended for raccoons. Safety studies on skunk species (Rupprecht et al. 1992a) indicate skunks would not be adversely affected. Also, an indirect beneficial effect would be a reduced risk of the species suffering further declines because of a rabies epizootic. If a spotted skunk was inadvertently captured in a cage trap set for a raccoon, it would be released unharmed to avoid lethal take and reported to the appropriate state agency to complement their population monitoring data for this state listed species. Therefore, the proposed action should have no significant impact on this species.
- **Black bear** (*Ursus americanus*) and Florida black bear (*Ursus americanus floridanus*). The black bear is state-listed as endangered in Ohio and as a species of concern in Kentucky. The Florida black bear is state-listed as threatened in Florida. The black bear inhabits the Wayne, Monongahela, Allegheny, Green Mountain, Talladega, Tuskegee, Conecuh, and Ocala National Forests where it is also listed as a Regional Forester Sensitive Species. It is conceivable that this species and subspecies could consume ORV baits intended for raccoons. Safety studies on black bear (Rupprecht et al. 1992a) indicate bears would not be adversely affected. An indirect beneficial effect would be a reduced risk of the species suffering further declines because of a rabies epizootic. Therefore, the proposed action should have no significant impact on this species.
- **Delmarva fox squirrel** (*Sciurus niger cinereus*). This species is state-listed as endangered in Pennsylvania. Although a few sightings of the Delmarva fox squirrel have been reported in the extreme southeast corner of the state, the Pennsylvania Game Commission has not documented these reports. This species is discussed in detail above with the federally listed T&E species.
- **Florida panther** (*Puma concolor coryi*). This species is state-listed as endangered in Georgia and Florida, and is known to inhabit the Ocala National Forest. It is not expected to be attracted to or to consume ORV baits. Also, animals the size of cougars would not be affected by cage-traps used to capture raccoons for monitoring purposes. Therefore, ORV programs, including monitoring activities involving the live-capture or lethal removal of raccoons, would have no effect on this species. A potential beneficial indirect impact of ORV programs on this species would be a reduced risk of contracting and dying of rabies if the spread of raccoon rabies is successfully halted or if the variant strain is eradicated.

The proposed action would have no effect on any of the other listed species in the National Forests involved in the proposed action (see Appendices C and D).

**Regional Forester Sensitive Species (USFS listing) Region 9, Eastern Region:**

- **River Otter** (*Lutra canadensis*). This species is designated as Regional Forester Sensitive in Wayne National Forest in Ohio.
- **Bobcat** (*Lynx rufus*). This species is designated as Regional Forester Sensitive in Wayne, White Mountain, Monongahela, Allegheny, and Green Mountain National Forests.
- **American marten** (*Martes americana*). This species is designated as extirpated from the forest in Allegheny National Forest in Pennsylvania and Green Mountain National Forest in Vermont. It is known to inhabit the White Mountain National Forest in New Hampshire.
- **Black bear** (*Ursus americanus*). This species is designated as Regional Forester Sensitive in Wayne, Monongahela, Allegheny, and Green Mountain National Forests.

The aforementioned species were discussed previously in the federal or state listed species section. The proposed action would have no effect on any of these or other listed species in the National Forests involved in the proposed action (see Appendix I).

**Regional Forester Sensitive Species (USFS listing) Region 8, Southern Region:**

- **Florida black bear** (*Ursus americanus floridanus*). This species is designated as Regional Forester Sensitive in Alabama and Florida National Forests. It is found to inhabit the Talladega, Tuskegee, and Conecuh National Forests in Alabama and the Ocala National Forest in Florida.
- **Round-tailed muskrat** (*Neofiber alleni*). This species is designated as Regional Forester Sensitive in National Forests in Florida. It is found to inhabit the Ocala National Forest in Florida.

The aforementioned species were discussed previously in the federal or state listed species section. The proposed action would have no effect on any of these or other listed species in the National Forests involved in the proposed action (see Appendix I).

- **Sherman's fox squirrel** (*Sciurus niger shermani*). This species is designated as Regional Forester Sensitive in National Forests in Florida. It is found to inhabit the Ocala National Forest in Florida. It is conceivable that this species could consume ORV baits intended for raccoons. Although not specifically tested for safety in this species, safety studies on other closely related rodent species (Rupprecht et al. 1992a) indicate fox squirrels would not be adversely affected. Also, an indirect beneficial effect would be a reduced risk of the species suffering further declines because of a rabies epizootic. If a Sherman's fox squirrel was inadvertently captured in a cage trap set for a raccoon, it would be released unharmed to avoid lethal take and reported to the appropriate Forest Service office to complement their population monitoring data for this state listed species. Therefore, the proposed action should have no significant impact on this species.

Under the proposed action, the potential effect on nontarget wildlife and T&E species from methods used in monitoring and surveillance programs would be slightly higher than the no action alternative; however, effects of the proposed action would be negligible.

#### 4.2.4 Potential for Adverse Effects on Pet Dogs or Other Domestic Animals that Might Consume the Baits.

Rupprecht et al. (1992a) and Pastoret et al. (1995) summarized the results of V-RG safety trials in nontarget species. The studies included oral vaccination of domestic dogs, cats, cattle, and sheep and found no adverse effects on those species. More than 51 million ORV baits using the RABORAL V-RG® vaccine have been distributed in the U.S. thus far with no reported adverse effects on domestic animals. There is no evidence of potential harm to target or nontarget species, including domestic dogs, cats, cattle, and sheep, from overdosage of RABORAL V-RG® vaccine by any route; a number of species have been dosed with 2 to 10 times the amount of vaccine in an individual ORV bait without adverse effects (USDA 1991, p. 47; Rupprecht et al. 1992a). Therefore, even if domestic animals received multiple doses of vaccine by consuming multiple baits, no adverse effects would be expected to occur.

As discussed in Section 4.2.1.2, a recent study indicates vaccinia virus that originated from a strain used in smallpox vaccinations in Brazil may have become established in domestic cows in that country (Damaso et al. 2000). This indicates there is some potential for use of vaccinia virus in vaccinations to result in a new emerging infectious disease in domestic animals; however, there is currently no evidence that this type of phenomenon has occurred in the U.S. (C. Rupprecht, CDC, pers. comm. 2001). Also, the vaccinia virus strain used for smallpox vaccination in Brazil was different than the strain that is currently used in the V-RG vaccine, and the vaccinia virus portion of V-RG is more attenuated (i.e., *weaker*) than strains used in smallpox vaccines (USDA 1991, p. 18-19). Thus, it is less likely that V-RG would result in the establishment and persistence of vaccinia virus in wild animal populations.

Instances have been reported where a pet dog has consumed several baits and then vomited the plastic sachets (R. Hale, Ohio Dept. of Health, pers. comm. 2001). Reports of these types of instances have been few, and the dogs have reportedly not experienced any substantive or long term adverse effects.

In FY 2001, 37 incidents were reported where pets came into contact with a bait; however, no reports were submitted regarding pets or other domestic animals experiencing any type of adverse reaction (USDA 2003b). Domestic animals that ingest a bait are most likely to be immunized against rabies or receive a boost from a previous vaccination. USDA (2003b) illustrates the number of baits distributed in those states conducting ORV programs and the number of people who reported contact or potential contact with a bait by their pet or other domestic animal (i.e., carrying bait in mouth, chewing bait, vomiting sachet). The number of documented exposures equates to less than 1% of the almost 5 million baits (or 1 domestic animal exposure/142,000 baits) distributed by APHIS-WS and state health departments in FY 2001. The majority of domestic animals reported to have been exposed to a bait involved mainly dogs and a few cats.

The RABORAL V-RG® vaccine distributed in baits would have no adverse effects on pets or other domestic animals. Implementation of an ORV program would likely have a moderate beneficial impact, greater than the no action alternative, by possibly immunizing these animals against rabies and reducing the likelihood of becoming exposed to an animal infected with the rabies virus.

#### 4.2.5 Potential for the Recombined V-RG Virus to "Revert to Virulence" and Result in a Virus that could Cause Disease in Humans or Animals.

The concern here is whether the V-RG recombinant virus is genetically stable so that it would not become virulent (i.e., capable of causing disease) after it replicates (or reproduces) in animals that eat ORV baits containing the RABORAL V-RG® vaccine and, perhaps, be transmitted on to other animals. This issue was addressed in previous EAs and in formal risk assessments by USDA (USDA 1991, p. 41-42; USDA *undated a*, *undated b*). The Wistar Institute conducted

experiments with mice in which the V-RG was “subpassaged”<sup>4</sup> four times into groups of mice (results cited in USDA 1991, p. 41). The V-RG virus could not be found after passage through the second or third groups of mice. The experiments demonstrated that the ability of the V-RG virus to cause disease does not increase by repeated animal passage, thus “reversion to virulence” is unlikely. Further alleviating the concern about this issue is the evidence that V-RG virus does not transmit readily to other animals from animals that have consumed ORV baits (Rupprecht and Kieny 1988). Therefore, the potential for the recombined V-RG virus to “revert to virulence” would be negligible (similar to the no action alternative). The RABORAL V-RG® vaccine distributed in baits would have no adverse effects on humans or animals.

#### **4.2.6 Potential for the RABORAL V-RG® Vaccine to Recombine with Other Viruses in the Wild to Form New Viruses that could Cause Disease in Humans or Animals.**

The concern here is whether the RABORAL V-RG® vaccine in the ORV baits might encounter other viruses in animals, exchange genetic material with them during replication, and result in new viruses that could cause serious diseases in humans or animals. This potential recombination has been recognized as being more probable with wild pox viruses that are genetically similar to the vaccinia virus used as the vector in the RABORAL V-RG® vaccine.

Wild pox viruses present in the U.S. include skunk, rodent, and raccoon pox viruses (C. Rupprecht, CDC, pers. comm. 2001). One type of wild pox virus that would logically be considered for the possibility of recombination with vaccinia virus is raccoon pox (RP) which could occur in raccoons targeted by ORV programs in the eastern U.S. For this type of unanticipated spontaneous recombination to occur, the V-RG and RP would have to simultaneously infect the same cells in the same animal at the same time. RP has not been found to be prevalent in the environment, with only two concurrent isolations (or detections) of it having occurred in the U.S. (Herman 1964, cited in USDA 1991, p. 42). Laboratory experiments on mice infected with RP and inoculated with V-RG showed no adverse effects on the mice (USDA, 1991, p. 42).

The Wistar Institute identified three circumstances that would have to occur simultaneously for there to be a chance of a hazardous recombination between V-RG and RP virus: (1) they would have to occur at the same time in the same animal; (2) “genome contact” (i.e., contact between the actual genetic material in the two viruses as they replicate in an infected cell); and (3) the regeneration of the gene that was previously removed from the vaccinia virus (known as the thymidine kinase “TK” gene) (USDA 1991, p. 42). Wistar determined the probability of all three circumstances occurring at the same time was 1 chance in 100 million or less (USDA 1991, p. 42). Also, if this did somehow occur resulting in a recombined virus with the functional “TK” gene reestablished, the properties and virulence of the new virus would probably be similar to the original recipient virus which is vaccinia (USDA *undated b*, p. 28). Vaccinia only causes mild short-term symptoms in most cases (i.e., similar to the localized rash and pustules that occurred on the arms of many persons who received smallpox vaccinations) (USDA 1991, p. 39; Elvinger 2001). Thus, recombination with wild viruses is unlikely, but, if it did occur, it is also unlikely to result in significant adverse effects on animals or people.

Combination of two types of pox viruses in rabbits or hares (leporipoxviruses) has been known to occur (Omlin 1997), but the combination of a leporipoxvirus with another unrelated pox virus has not been known to occur (USDA 1991, p. 42). Rare examples of recombination between different poxviruses in animal hosts have been documented, although the probability of two viruses infecting the same cell at the same time (which is required for recombination to occur) under

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<sup>4</sup> This means the V-RG was inoculated into one group of mice from which material containing the virus was obtained later and injected into a second group of mice, and then material obtained from the second group was injected into a third group, etc., until four such passages had been conducted.

natural conditions remains very low (Omlin 1997). Recombination of V-RG with viruses other than orthopoxviruses is not likely (Omlin 1997). In formal risk analyses, USDA concluded that the probability of recombination with other orthopoxviruses would be limited due to the low prevalence of orthopoxviruses in wildlife species in the U.S. (USDA *undated a, undated b*).

Hahn (1992) concluded that vaccines developed by the newer genetic engineering (i.e., recombinant) techniques such as the ones used to make V-RG vaccine are no more hazardous than vaccines created by more conventional methods (e.g., "attenuation" and "fractionation"). He further indicated that, with recombinant technology, the potential for ending up with a dangerous virulent strain is probably less than with the older "hit-or-miss" methods, because the specific genetic material responsible for making a virus virulent can be removed or altered which makes the virus safer.

This analysis, which incorporates previous analyses by reference, supports a conclusion that adverse environmental effects from spontaneous recombination of V-RG with other wild viruses are exceedingly unlikely (similar to the no action alternative). This is further supported by the fact there have been no observed adverse effects in wildlife and humans both in Europe and North America following a number of years of experimental and field use of the V-RG vaccine.

#### **4.2.7 Potential for Aerially Dropped Baits to Strike and Injure People or Domestic Animals.**

ORV baits would be distributed from aircraft at an average density of 75 baits per square km (194 per square mile) in eastern states where raccoon rabies is targeted. Those densities are sparse enough to predict that the chance of a person being struck and harmed by a falling bait is extremely remote. For example, if 100 persons were standing outdoors in a square mile of area in which ORV baits were being dropped, and each person occupies about two square feet of space at the time that baits were dropped, the chance of being struck would be 1 in 139,000 (200 square feet total space occupied by persons divided by 27.8 million square feet per square mile). The low risk of being struck is further supported by the fact that out of more than 51 million ORV baits distributed from aircraft in the U.S. and Canada since 1995, only five incidents have been reported in which a person claimed to have been struck by a falling bait. Four of these incidents occurred in Texas, Ohio, and Ontario and did not result in any significant injury or harm to the individuals involved (G. Moore, TX Dept. of Health, pers. comm. 2001; R. Hale, OH Dept. of Health, pers. comm. 2001; C. MacInnes, Ontario Ministry of Natural Resources, pers. comm. 2001). Almost 5 million baits were distributed by APHIS-WS in FY 2001 and there was only one unconfirmed report of a man in WV who was hit in the head by a falling bait. However, no report of injury was received from this alleged incident, which remains unconfirmed. In FY 2001, no cases were documented involving falling baits striking or injuring domestic animals (USDA 2003b). This effect is further mitigated by the fact that bait drop crews avoid dropping baits into cities, towns, and other areas with human dwellings, or if humans are observed below. Hand placement or dropping of baits from slower moving helicopters to allow for more precise control over the areas on which the baits are dropped would primarily be used in urban parks or suburban situations, which would further reduce the risk of being struck. Thus, under the proposed action the risk of aerially dropped baits striking and/or injuring people or domestic animals is slightly greater than the no action alternative; however the risk is still extremely remote.

#### **4.2.8 Cost of Raccoon Rabies ORV Programs in Comparison to Perceived Benefits.**

Meltzer (1996) described a model for estimating the costs and benefits of using oral vaccines to stop or prevent raccoon rabies and identified factors important for consideration. Preventing raccoon rabies from moving into an area is generally much less expensive than the cost of elimination. The cost of eliminating raccoon rabies from New York using ORV was estimated at \$72.9 million over a 10-year period. Statewide cost of raccoon rabies was estimated at \$0.23 per capita pre-epizootic to \$0.89 per capita once the area became infected. Comparing 1990 to 1994, New York found the rabies epizootic increased that state's annual costs over \$10 million per year

(Huntley et al. *unpublished* 1996).

Benefit:cost ratios of using V-RG vaccine in oral baits to control raccoon rabies in two counties in New Jersey were estimated by Uhaa et al. (1992). In that study, the estimated value of benefits was 2.21 times the cost for the most expensive vaccination program. The least expensive program resulted in benefits that exceeded costs by a factor of 6.8. The authors concluded that the program would be cost effective (Uhaa et al. 1992).

Kemere et al. (2001) conducted a detailed analysis of the expected costs compared to the expected value of benefits for establishing a barrier to prevent further westward spread of raccoon rabies that would extend from Lake Erie to the Gulf of Mexico. The barrier would combine natural barriers provided by geographical features such as the Appalachian Mountains with ORV zones. All program costs and benefits (in terms of avoided costs) were discounted to present values to provide valid comparisons. The types of costs avoided by preventing the westward spread of raccoon rabies included post-exposure vaccination treatments for humans, need for increased livestock vaccinations, and costs of increased surveillance and monitoring of rabies in wildlife and domestic animals (including laboratory diagnostic costs, costs of preparing samples for testing, and animal bite investigations). The analysis did not factor in an economic benefit for lives saved. It also did not factor in the potential benefit of decreased costs associated with nuisance and damage by raccoons or of raccoon impacts on ground nesting birds that might occur if the epizootics were not treated and raccoon populations declined as a result. It is probable that such a potential benefit would be short term (1-3 years) until local raccoon populations recovered, or were affected by other disease cycles. However, these types of outcomes are largely unpredictable.

Costs of establishing and maintaining the raccoon rabies barrier are estimated to total between \$58 million and \$148 million, while the estimates of net benefits ranged between \$48 million and \$496 million. The analysis indicated that a large scale ORV program should be economically feasible and that net economic benefits would most likely be substantial (Kemere et al. 2001).

Since ORV program inception, positive rabies cases have either decreased or the advance of the virus has been slowed or stopped in each state where an ORV program was initiated. In Maryland, 18 rabies cases were reported per year on the Annapolis Peninsula alone before the ORV program began in 1998 and by 2000 and 2001, zero cases were reported. In New York, an ORV program was implemented in 1998 to prevent the northward spread of the virus. Prior to the ORV program, 148 positive rabies cases were recorded in 1998. In 2001, New York reported a decline to 3 positive cases. In Ohio, 62 positive rabies cases were recorded prior to program implementation in 1997. In FY 2001, zero cases were reported. In Massachusetts, an ORV barrier has contributed to preventing raccoon rabies from advancing onto Cape Cod. In Vermont, before the program was started in 1996, positive rabies cases were found 73 km. south of the Canada border. With an annual rate of spread of rabies at 30 miles/year (Kemere et al. 2001), positive raccoon strain rabies cases should have reached the Canada border as early as 1999. However, the border has not yet been breached (USDA 2002b). These data clearly demonstrate that APHIS-WS' assistance in stopping the forward advance of various rabies strains and in reducing the incidence of rabies cases involving wild and domestic animals and rabies exposures to humans achieves the objectives of the EA.

Surveillance activities were conducted in Maryland, New York, Ohio, Pennsylvania, Vermont, and West Virginia to assess aerial or ground ORV baiting efficacy. Several density studies were conducted within the ORV zones in Massachusetts, New York, Ohio, and Virginia to determine raccoon densities in various areas in relation to habitat, elevation, and numbers of baits distributed. In areas where raccoon densities are low, baiting may be reduced to increase cost effectiveness of the ORV program (USDA 2002b, USDA 2003b). Additionally, APHIS-WS continues to conduct research to determine cost-saving measures such as target species density estimates in relation to numbers of ORV baits distributed; utilization of natural barriers such as mountains and rivers to reduce the number of baits used; assessment of ORV baiting efficacy (i.e., distance between flight

lines to maximize bait uptake by target species); and identification of the most effective bait types (i.e., coated sachet versus fishmeal polymer bait) (USDA 2002b, USDA 2003b).

Thus, the benefit:cost ratio of the proposed action would be expected to be much greater (more desirable) than that of the no action alternative.

#### **4.2.9 Humaneness of Methods Used to Collect Wild Animal Specimens Critical for Timely Program Evaluation or to Reduce Local Populations of Target Species under State Contingency Plans.**

Some people would view methods employed to capture and/or kill raccoons and other wild animals for monitoring and surveillance or local depopulation purposes as inhumane. Humaneness, as it relates to the killing or capturing of wildlife is an important but complex concept that can be interpreted in a variety of ways. Humaneness is a person's perception of harm or pain inflicted on an animal, and people may perceive the humaneness of an action differently.

However, humaneness as it relates to the natural world through natural mortality versus man-induced mortality must be brought into perspective. DeVos and Smith (1995) explain the characteristics of natural mortality in wildlife populations. There seems to be an increasing public perception that, left alone by humans, animal populations will experience few premature deaths and live to an old age without harm, pain or suffering. It should be recognized that wildlife populations reproduce at far greater rates than would be necessary to replace deaths if all lived to old age. To counterbalance this high reproduction, it is natural for most individuals of most species to die young, often before reaching breeding age. Natural mortality in wildlife populations includes predation, malnutrition, disease, inclement weather, and accidents. These "natural" deaths are often greater in frequency than human-caused deaths through regulated hunting, trapping, and wildlife damage management operations. From the standpoint of the animal, these natural mortality factors also may cause more suffering by wildlife, as perceived by humans, than human-induced mortality. Under given habitat conditions, most wildlife populations fluctuate around a rather specific density, sometimes called the carrying capacity. Populations that overshoot this density via reproduction become very sensitive to various sources of mortality, and death rates increase. Conversely, as populations drop, mortality rates decline (DeVos and Smith 1995). Thus, human-induced mortality - which often involves much less suffering of individual animals - invariably lessens mortality from other sources. For example, it would seem that an animal taken in a leg-hold trap or by a snare, would certainly suffer less than if it died from rabies.

Research suggests that with some methods, such as restraint in leghold traps, changes in the blood chemistry of trapped animals indicate "stress." Blood measurements indicated similar changes in foxes that had been chased by dogs for about five minutes as those restrained in traps (USDA 1997j). However, such research has not yet progressed to the development of objective, quantitative measurements of pain or stress for use in evaluating humaneness. The challenge in coping with this issue is how to achieve the least amount of animal suffering with the constraints imposed by current technology. To insure the most professional handling of these issues and concerns, APHIS-WS has policies giving direction toward the achievement of the most humane program possible while still accomplishing the program's mission.

APHIS-WS has improved the selectivity of management devices through research and development of pan-tension devices and other device modifications such as breakaway snares. Research is continuing with the goal of bringing new findings and products into practical use. Until such time as new findings and products are found to be practical, some animal suffering will occur during lethal collection of animal specimens if monitoring and program effectiveness objectives are to be met. However, fewer animals would likely die of the raccoon rabies virus variant than the no action alternative, which could be viewed as more humane by reducing animal suffering.

### **4.3 Alternative 3 -- Live-Capture-Vaccinate-Release Programs.**

#### **4.3.1 Potential for Adverse Effects on People that Become Exposed to the Vaccine or the Baits.**

Under this alternative, APHIS-WS would not participate in ORV programs on National Forest System lands, but would assist with live-capture-vaccinate-release programs. For purposes of comparison, it is assumed that, with adequate APHIS-WS funding and personnel to conduct these types of programs, states would choose not to implement ORV programs on National Forest System lands.

##### **4.3.1.1 Potential to Cause Rabies in Humans.**

Live-capture-vaccinate-release programs might be as effective as ORV programs in stopping the spread of the raccoon rabies variant if conducted throughout all areas where ORV programs would have been conducted under the proposed action. The method itself would not present risk of causing rabies in members of the public. The risk of having an increase in human rabies cases because of the failure to stop epizootics of raccoon rabies would be about the same as with ORV programs under the proposed action, but would be less than the no action alternative.

##### **4.3.1.2 Potential for Vaccinia Virus to Cause Disease in Humans.**

Because it is assumed that ORV using the vaccinia virus vector in V-RG would not be used by states or by APHIS-WS on National Forest System lands, there should be no risk of vaccinia virus infections in humans caused by contact with the vaccine from ORV baits.

##### **4.3.1.3 Potential to Cause Cancer (Oncogenicity).**

No increased risk of cancer would result from this alternative.

#### **4.3.2 Potential for Adverse Effects on Target Wildlife Species Populations.**

Under this alternative, APHIS-WS would not provide funds for ORV purchase and distribution on National Forest System lands, but would assist in monitoring and surveillance programs involving the capture or lethal collection and testing of wild raccoons following live-capture-vaccinate and release activities.

##### **4.3.2.1 Effects of the ORV V-RG Vaccine on Raccoons.**

Under a live-capture-vaccinate-release alternative, it is expected that little or no ORV use by the states would occur on National Forest System lands. Thus, there would be little or no potential for the V-RG oral vaccine to affect these species.

##### **4.3.2.2 Effects of Monitoring/Surveillance or Localized Population Reduction (Contingency Actions) on Raccoon Populations in Eastern States.**

Under a live-capture-vaccinate-release alternative, it is expected that extent of lethal removal of raccoons on National Forest System lands for monitoring/surveillance activities or localized population reduction under contingency plans to address rabies outbreaks would be similar to the proposed action and slightly greater than the no action alternative. Thus, the impact on populations of raccoons would be similar to the proposed action and slightly greater than the no action alternative. Either way, however, the impact would be negligible.



**4.3.3 Potential for Adverse Effects on Nontarget Wildlife Species, including Threatened or Endangered Species.**

**4.3.3.1 Effects of the V-RG Vaccine on Nontarget Wildlife including Threatened or Endangered Species.**

Under a live-capture-vaccinate-release alternative, it is expected that little or no ORV use by the states would occur on National Forest System lands. Thus, there would be no potential for the V-RG oral vaccine to affect nontarget species. Live-capture-vaccinate-release programs would be virtually 100% selective for target species and would therefore have little or no potential to affect nontarget wildlife.

**4.3.3.2 Effects of Capture/Removal Methods (Used in Monitoring and Surveillance or to Reduce Local Populations of Target Species under State Contingency Plans) on Nontarget Species, including Threatened or Endangered Species.**

Under this alternative, APHIS-WS would assist in monitoring activities and, potentially, in localized contingency plan removals on National Forest System lands that involve the use of lethal methods such as those discussed under the proposed action. The potential for effects on nontarget species would be similar to the proposed action and slightly greater than the no action alternative. The analysis in Section 4.2.3 shows effects on nontarget and T&E species would not be significant.

**4.3.4 Potential for Adverse Effects on Pet Dogs or Other Domestic Animals that Might Consume the Baits.**

Live-capture-vaccinate-release programs would pose no risk of inadvertent vaccine exposure to pets or other domestic animals.

**4.3.5 Potential for the Recombined V-RG Virus to "Revert to Virulence" and Result in a Virus that could Cause Disease in Humans or Animals.**

Under this alternative, it is assumed that the states would not use ORV baits with the V-RG vaccine on National Forest System lands. Thus, there would be no potential for the V-RG virus to revert to a more virulent strain.

**4.3.6 Potential for the V-RG Virus to Recombine with Other Viruses in the Wild to Form New Viruses that could Cause Disease in Humans or Animals.**

Under this alternative, it is assumed that the states would not use ORV baits with the V-RG vaccine on National Forest System lands. Thus, there would be no potential for the V-RG virus to recombine with other viruses in the wild.

**4.3.7 Potential for Aerially Dropped Baits to Strike and Injure People or Domestic Animals.**

Under this alternative it is assumed there would be few or no ORV baits dropped from aircraft on National Forest System lands. Thus, there would be no potential for such baits to strike people or animals.

**4.3.8 Cost of Raccoon ORV Programs in Comparison to Perceived Benefits.**

A live-capture-vaccinate-release program to control rabies in skunks and raccoons was implemented in Toronto in 1992 and cost an estimated \$450 to \$1,150/sq km (\$1,165 to \$2,979/sq

mile) in Canadian dollars (Rosatte et al. 1992). A more recent cost estimate of \$500 Canadian/sq km for a trap-vaccinate-release program in Ontario was presented by Rosatte et al. (2001). This analysis assumes the latest cost estimate in Rosatte et al. (2001) is the most applicable for comparing this alternative with ORV programs. At the current exchange rate of 0.738 U.S. dollars per Canadian dollar (OANDA 2003), the cost would be about \$369/sq km in U.S. dollars. In contrast, Kemere et al. (2001) estimated the cost of establishing an ORV barrier of 102,650 sq km (39,623 sq mi) from Lake Erie to the Gulf coast as totaling about \$121/sq km (\$313/sq mi) (costs included \$1.30/bait, 75 baits/sq km, \$8.62/sq km for aerial distribution cost, and \$15/sq km for program evaluation). This is comparable to the reported cost of ORV in Ontario of \$200 Canadian/sq km (\$130 U.S./sq km) (Rosatte et al. 2001). Therefore, it appears a live-capture-vaccinate-release alternative to manage raccoon rabies could cost about 2.5 times as much as the proposed action. Although a greater known proportion of targeted raccoon populations may be vaccinated by this approach (Rosatte, et al. 2001), it is probably not necessary to achieve such greater vaccination rates because ORV programs have been successful in stopping or eliminating raccoon rabies outbreaks (see Section 1.1.4). Based on the analysis in Section 4.2.8, it appears benefits may not exceed costs under this alternative. Thus, the benefit:cost ratio of this program would be less than the proposed action and the no action alternative.

#### **4.3.9 Humaneness of Methods Used to Collect Wild Animal Specimens Critical for Timely Program Evaluation or to Reduce Local Populations of Target Species under State Contingency Plans.**

Some persons would view live-capture-vaccinate-release programs as less humane than ORV programs, because large numbers of animals would experience the stress of being caught and handled to administer the vaccine. Others would view them as relatively humane compared to other types of rabies control efforts that involve lethal means to suppress target populations over broad geographic areas. Because it is believed this alternative could be as successful in stopping or preventing the spread of rabies as the proposed action, the amount of animal suffering due to contracting and dying from rabies would probably be similar to the proposed action, but less than the no action alternative.

#### **4.4 Alternative 4 – Provide APHIS-WS Funds to Purchase and Participate in ORV Programs on National Forest System Lands without Animal Specimen Collections or Lethal Removal of Animals under Contingency Plans.**

Under this alternative, the states would have to fund collection of target species on National Forest System lands for monitoring and surveillance without APHIS-WS funds or personnel assistance. This would likely mean that less monitoring would be conducted. If insufficient monitoring and surveillance occurs along the leading edge of the advancing rabies strains, rabies managers would not be able to plan the most efficient and effective use of ORV baiting strategies to control the specific strains spread by wild carnivores. One possibility is that, without adequate surveillance, managers would have to resort to distributing ORV baits across more areas than necessary. The ability to stop or prevent the forward advance of specific rabies strains would likely be reduced, perhaps to the point that cooperative efforts fail.

##### **4.4.1 Potential for Adverse Effects on People that Become Exposed to the Vaccine or the Baits.**

###### **4.4.1.1 Potential to Cause Rabies in Humans.**

This alternative would present the same risk as the proposed action and the no action alternative. Since the V-RG vaccine cannot cause rabies, there would be no potential for the ORV baits to cause rabies in humans under this or any other alternative or scenario involving the distribution of V-RG oral vaccine baits. However, there would be a greater risk of human rabies cases if the lack of federal assistance in monitoring and surveillance results in a reduction in the effectiveness of ORV programs.

#### **4.4.1.2 Potential for Vaccinia Virus to Cause Disease in Humans.**

This alternative would present the same risk as the proposed action and the no action alternative. As shown by the analysis in Section 4.2.1, the risk of V-RG vaccine in ORV baits causing any health problems in humans is exceedingly low.

#### **4.4.1.3 Potential to Cause Cancer (Oncogenicity).**

This alternative would result in no probable risk of causing cancer in humans or animals, similar to the no action and other alternatives.

### **4.4.2 Potential for Adverse Effects on Target Wildlife Species Populations.**

#### **4.4.2.1 Effects of the ORV V-RG Vaccine on Raccoons.**

This alternative would result in the same risk as the proposed action and no action, which is that adverse effects are highly unlikely. Positive effects on these species from protecting them against rabies would be similar to the proposed action and slightly greater than the no action. However, more animals are likely to die of rabies if the lack of federal assistance in monitoring and surveillance results in a reduction in the effectiveness of ORV programs.

#### **4.4.2.2 Effects of Monitoring/Surveillance or Localized Population Reduction (Contingency Actions) on Raccoon Populations in Eastern States.**

Under this alternative, APHIS-WS would not provide assistance in collecting animal specimens on National Forest System lands for monitoring purposes. The involved states could still conduct such collections; however, it is likely that fewer animals would be collected without APHIS-WS funds and assistance for that activity. Effects on raccoon populations would be exceedingly minor as supported by the analysis in Section 4.2.2.2.

### **4.4.3 Potential for Adverse Effects on Nontarget Wildlife Species, including Threatened or Endangered Species.**

#### **4.4.3.1 Effects of the RABORAL V-RG® Vaccine on Nontarget Wildlife including Threatened or Endangered Species.**

Effects of the V-RG vaccine on nontarget wildlife would be the same as under the proposed action and the no action alternatives. The analysis in Section 4.2.3.1 showed that adverse effects are unlikely. However, more animals are likely to die of rabies if the lack of federal assistance in monitoring and surveillance results in a reduction in the effectiveness of ORV programs.

#### **4.4.3.2 Effects of Capture/Removal Methods (Used in Monitoring and Surveillance or to Reduce Local Populations of Target Species under State Contingency Plans) on Nontarget Species, including Threatened or Endangered Species.**

Under this alternative, APHIS-WS would not continue to assist in monitoring activities or local depopulation activities on National Forest System lands that involve the use of lethal methods such as those discussed under the proposed action. Therefore, the potential for adverse effects on nontarget species would be even lower than under the proposed action and slightly lower than the no action alternative. States would still likely implement monitoring and localized population reduction actions even without APHIS-WS, but such activities would likely be on a lesser scale without APHIS-WS funds. However, the analysis in Section 4.2.3.2 indicates effects on nontarget and T&E species would not be significant under the proposed action and would likely also not be

significant even without APHIS-WS assistance.

**4.4.4 Potential for Adverse Effects on Pet Dogs or Other Domestic Animals that Might Consume the Baits.**

Under this alternative, the potential for adverse effects on domestic animals from ORV baits would be the same as the proposed action and the no action alternative. Based on the analysis in Section 4.2.4, there is almost no potential for significant adverse effects on domestic animals because of ORV bait consumption under any scenario involving the distribution of ORV baits containing the V-RG vaccine. Stopping or preventing the spread of rabies would result in beneficial effects on domestic animals by reducing their likelihood of contracting rabies. However, more domestic animals are likely to die of rabies if the lack of federal assistance in monitoring and surveillance on National Forest System lands results in a reduction in the effectiveness of ORV programs.

**4.4.5 Potential for the Recombined V-RG Virus to "Revert to Virulence" and Result in a Virus that could Cause Disease in Humans or Animals.**

This potential would be the same as under the proposed action and the no action. The risk of adverse effects from the V-RG virus possibly reverting to a more virulent strain would be highly remote.

**4.4.6 Potential for the V-RG Virus to Recombine with Other Viruses in the Wild to Form New Viruses that could Cause Disease in Humans or Animals.**

This potential would be the same as under the proposed action and no action. The risk of adverse effects from the V-RG virus possibly recombining with other viruses in the wild and resulting in significant adverse effects on human or animal health would be highly remote.

**4.4.7 Potential for Aerially Dropped Baits to Strike and Injure People or Domestic Animals.**

This potential would be the same as under the proposed action and slightly greater than the no action. The risk of striking and injuring people or domestic animals with baits is highly remote.

**4.4.8 Cost of Raccoon ORV Programs in Comparison to Perceived Benefits.**

Costs of the federal portion of state-run ORV programs would be less since no APHIS-WS funds would be spent on animal collections to be used in monitoring. Benefits would probably be similar to the proposed action, but benefits may be greater than the no action alternative. Total costs, including the expenditure of federal and state funds, might be similar if states increased activities for monitoring because of the lack of APHIS-WS funds for this type of activity. Benefits would still probably exceed costs unless reduced monitoring/surveillance results in a reduction in the effectiveness of ORV programs.

**4.4.9 Humaneness of Methods Used to Collect Wild Animal Specimens Critical for Timely Program Evaluation or to Reduce Local Populations of Target Species under State Contingency Plans.**

Under this alternative, no APHIS-WS funds would be used to collect animal specimens or to conduct localized population reduction of target species using live-capture or lethal methods. States could still conduct these activities, but such efforts would probably be at a lesser scale without APHIS-WS assistance. This alternative would be viewed by some persons as more humane than the proposed action and the no action alternatives. Animal suffering due to rabies would probably be similar to the proposed action, but less than the no action (i.e., greatly reduced). However, more animals are likely to suffer and die of rabies if reduced

monitoring/surveillance results in a reduction in the effectiveness of ORV programs (see Section 4.2.9 for more detailed discussion).

#### 4.5 CUMULATIVE IMPACTS

No significant cumulative environmental impacts are expected from any alternative, with the possible exception of Alternative 1 - No Action, which might lead to increased human exposures and domestic and wild animal rabies cases across much of the U.S. Although some persons will likely remain opposed to the use of recombinant vaccines or the use of the vaccinia pox virus as a component of the ORV, and some will remain opposed to the lethal removal of raccoons for monitoring purposes or for implementation of contingency rabies management plans, the analysis in this EA indicates that ORV use and such lethal removals will not result in significant risk of cumulative adverse impacts on the quality of the human environment.

#### 4.6 SUMMARY OF IMPACTS OF ALTERNATIVES FOR EACH ISSUE

Table 4-1 presents a comparison of the alternatives and environmental consequences (impacts) on each of the issues identified for detailed analysis:

**Table 4-1. Issues/Impacts/Alternatives/Comparison**

Issues/Impacts	Alt. 1: No Action (no rabies control on National Forest System lands provided)	Alt. 2: Proposed Action (ORV and monitoring/surveillance, potential localized target species population reduction on National Forest System lands)	Alt. 3: Live Capture/Vaccinate and Release on National Forest System lands	Alt. 4: ORV without Lethal Animal Collections or Removals on National Forest System lands
Potential for adverse effects on people that become exposed to the vaccine or the baits.				
<ul style="list-style-type: none"> <li>Potential to cause rabies in humans.</li> </ul>	No probable risk from ORV use by states. Higher risk of human rabies cases if states are unable to stop the spread of rabies without federal assistance.	No probable risk.	No probable risk.	No probable risk from ORV use; higher risk of human rabies cases if reduced monitoring and surveillance reduces effectiveness of ORV programs.
<ul style="list-style-type: none"> <li>Potential for vaccinia virus to cause disease in humans</li> </ul>	States would likely still conduct ORV programs, but probably on a lesser scale without federal assistance.	Possible but risk is low; risk of significant adverse effects on individuals that experience vaccinia infections also is low. Slightly higher risk than Alt. 1	No risk.	Possible but risk is low; risk of significant adverse effects on individuals that experience vaccinia infections also is low. Slightly higher risk than Alt. 1.
<ul style="list-style-type: none"> <li>Potential to cause cancer (oncogenicity).</li> </ul>	No probable risk.	No probable risk.	No probable risk.	No probable risk.
Potential for adverse effects on target wildlife species populations.				
<ul style="list-style-type: none"> <li>Effects of the ORV V-RG vaccine on raccoons.</li> </ul>	No probable risk; states would likely still conduct ORV programs, but probably on a lesser scale without federal assistance.	No probable risk of adverse impacts.	No risk from V-RG vaccine.	No probable risk of adverse impact (same as Alt 2).

Table 4-1. Issues/Impacts/Alternatives/Comparison

<ul style="list-style-type: none"> <li>Effects of monitoring and surveillance and localized population reduction actions on raccoon populations in eastern states.</li> </ul>	States would still conduct monitoring and surveillance and contingency actions, but these are likely to be on a lesser scale without federal assistance.	Slightly higher impact than Alt. 1, but impact still very low.	Slightly higher impact than Alt. 1, but impact still very low.	Slightly lower impact than Alt. 2, same as Alt. 1; states would still conduct monitoring and surveillance and contingency actions, but these are likely to be on a lesser scale without federal assistance.
Potential for adverse effects on nontarget wildlife species, including threatened or endangered species.				
<ul style="list-style-type: none"> <li>Effects of the RABORAL V-RG® vaccine on nontarget wildlife including threatened or endangered species.</li> </ul>	No probable risk of adverse effects from ORV vaccine; but greater risk of adverse effects on these species from rabies.	No effect on T&E species; No probable risk of adverse effects on other nontarget species.	No effect on T&E species; no risk of adverse effect on other species from ORV vaccine.	No effect on T&E species; No probable risk of adverse effects on other nontarget species; but greater risk of adverse effects on these species from rabies if reduced monitoring and surveillance reduces effectiveness of ORV programs.
<ul style="list-style-type: none"> <li>Effects of capture/removal methods (used in monitoring, surveillance, and localized population reduction) on nontarget species, including threatened or endangered species.</li> </ul>	No effect on T&E species; Very low risk of adverse effects on other nontarget species.	Probably slightly greater impact than Alt. 1. No effect on T&E species; Very low risk of adverse effects on other nontarget species.	Same as Alt. 1.	Same impact as Alt. 1; states would still conduct monitoring and surveillance and contingency actions, but these are likely to be on a lesser scale without federal assistance.
Potential for adverse effects on pet dogs or other domestic animals that might consume the baits.	Low risk; states would likely still conduct ORV programs. Increased risk of rabies for unvaccinated animals without federal assistance.	Low risk; Possible benefit from improving immunity to rabies.	No risk of adverse effects from consuming ORV baits.	Low risk; increased risk of rabies for unvaccinated animals if reduced monitoring and surveillance reduces effectiveness of ORV programs.
Potential for the recombined V-RG virus to "revert to virulence" and result in a virus that could cause disease in humans or animals.	States would likely still conduct ORV programs.	Slightly greater risk than Alt. 1, but still very low.	No risk.	Low risk (slightly greater than Alt. 1).
Potential for the V-RG virus to recombine with other viruses in the wild to form new viruses that could cause disease in humans or animals.	States would likely still conduct ORV programs.	Slightly greater risk than Alt. 1, but still very low.	No risk.	Low risk (slightly greater than Alt. 1).
Potential for aerially dropped baits to strike and injure people or domestic animals.	States would likely still conduct ORV programs.	Slightly greater risk than Alt. 1, but still low.	No risk.	Low risk (slightly greater than Alt. 1).
Cost of the program in comparison to perceived benefits.	Cost of adverse effects from rabies spread would be much greater than cost savings from not having federal assistance.	Expected benefits exceed costs of program.	Expected benefits unlikely to exceed costs of program.	Expected benefits exceed costs of program; benefits may not exceed costs if reduced monitoring and surveillance reduces effectiveness of ORV programs.

Table 4-1. Issues/Impacts/Alternatives/Comparison

Humaneness of methods used to collect wild animal specimens critical for timely program evaluation or to reduce local populations of target species under state contingency plans	States likely to still conduct ORV programs with monitoring and surveillance and contingency plan implementation, but at a smaller scale without federal assistance; more animals likely to die of rabies if lack of federal assistance reduces effectiveness of ORV programs.	Probably more impact on this issue than Alt. 1. Capture and handling of raccoons would be viewed by some persons as inhumane. However, many animals would be saved from suffering and death due to rabies.	Capture and handling of target species would be viewed by some persons as inhumane. However, target animals would be released, so this alternative would be viewed as more humane than Alt. 1 and 2.	This Alt. would be viewed as more humane than Alt. 2 and similar to Alt. 1; states likely to still conduct monitoring and surveillance and contingency plan implementation, but at a smaller scale without federal assistance; more animals likely to die of rabies if reduced monitoring and surveillance reduces effectiveness of ORV programs.
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**APPENDIX A**  
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APPENDIX B  
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**APPENDIX C**  
**SPECIES LISTED AS THREATENED OR ENDANGERED AND SPECIES PROPOSED OR**  
**CANDIDATES FOR LISTING UNDER THE ENDANGERED SPECIES ACT**

**Alabama -- 115 listings****Animals -- 97**

E	Acornshell, southern ( <i>Epioblasma othcaloogensis</i> )	T	Elimia, lacy (snail) ( <i>Elimia crenatella</i> )
T(S/A)	Alligator, American ( <i>Alligator mississippiensis</i> )	E	Fanshell ( <i>Cyprogenia stegaria</i> )
E	Bat, gray ( <i>Myotis grisescens</i> )	T	Heelsplitter, Alabama (=inflated) ( <i>Potamilus inflatus</i> )
E	Bat, Indiana ( <i>Myotis sodalis</i> )	E	Kidneyshell, triangular ( <i>Ptychobranthus greeni</i> )
XN	Bean, Cumberlandian (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Villosa trabalis</i> )	E	Lampmussel, Alabama Entire Range; Except where listed as Experimental Populations ( <i>Lampsilis virescens</i> )
XN	Blossom, tubercled (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma torulosa torulosa</i> )	XN	Lampmussel, Alabama AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Lampsilis virescens</i> )
E	Blossom, turgid (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma turgidula</i> )	E	Lilliput, pale (pearlymussel) ( <i>Toxolasma cylindrellus</i> )
XN	Blossom, turgid (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma turgidula</i> )	E	Lioplax, cylindrical (snail) ( <i>Lioplax cyclostomaformis</i> )
E	Blossom, yellow (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma florentina florentina</i> )	XN	Mapleleaf, winged (mussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Quadrula fragosa</i> )
XN	Blossom, yellow (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma florentina florentina</i> )	T	Moccasinshell, Alabama ( <i>Medionidus acutissimus</i> )
E	Campeloma, slender ( <i>Campeloma decampi</i> )	E	Monkeyface, Cumberland (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Quadrula intermedia</i> )
E	Catspaw (=purple cat's paw pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma obliquata obliquata</i> )	XN	Monkeyface, Cumberland (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Quadrula intermedia</i> )
XN	Catspaw (=purple cat's paw pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma obliquata obliquata</i> )	E	Mouse, Alabama beach ( <i>Peromyscus polionotus ammobates</i> )
E	Cavefish, Alabama ( <i>Speoplatyrhinus poulsoni</i> )	E	Mouse, Perdido Key beach ( <i>Peromyscus polionotus trissyllepsis</i> )
T	Chub, spotfin Entire ( <i>Cyprinella monacha</i> )	T	Mucket, orangenacre ( <i>Lampsilis perovalis</i> )
XN	Clubshell AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Pleurobema clava</i> )	E	Mucket, pink (pearlymussel) ( <i>Lampsilis abrupta</i> )
E	Clubshell, ovate ( <i>Pleurobema perovatum</i> )	E	Mussel, oyster Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma capsaeformis</i> )
E	Clubshell, southern ( <i>Pleurobema decisum</i> )	XN	Mussel, oyster AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma capsaeformis</i> )
E	Combshell, Cumberlandian Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma brevidens</i> )	XN	Pearlymussel, birdwing AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Conradilla caelata</i> )
XN	Combshell, Cumberlandian AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma brevidens</i> )	E	Pearlymussel, cracking Entire Range; Except where listed as Experimental Populations ( <i>Hemistena lata</i> )
E	Combshell, southern ( <i>Epioblasma penita</i> )	XN	Pearlymussel, cracking AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Hemistena lata</i> )
E	Combshell, upland ( <i>Epioblasma metastrata</i> )	XN	Pearlymussel, dromedary AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Dromus dromas</i> )
E	Darter, boulder ( <i>Etheostoma wapiti</i> )	E	Pebblesnail, flat ( <i>Lepyrium showalteri</i> )
T	Darter, goldline ( <i>Percina aurolineata</i> )	E	Pigtoe, dark ( <i>Pleurobema furvum</i> )
T	Darter, slackwater ( <i>Etheostoma boschungii</i> )	E	Pigtoe, finerayed Entire Range; Except where listed as Experimental Populations ( <i>Fusconaia cuneolus</i> )
T	Darter, snail ( <i>Percina tanasi</i> )	XN	Pigtoe, finerayed AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam,
E	Darter, vermilion ( <i>Etheostoma chermockii</i> )		
E	Darter, watercress ( <i>Etheostoma nuchale</i> )		
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )		

	Colbert and Lauderdale Counties, AL		
	( <i>Fusconaia cuneolus</i> )	E	Snail, tulotoma ( <i>Tulotoma magnifica</i> )
E	Pigtoe, flat ( <i>Pleurobema marshalli</i> )	T	Snake, eastern indigo ( <i>Drymarchon corais couperi</i> )
E	Pigtoe, heavy ( <i>Pleurobema taitianum</i> )	E	Stirrupshell ( <i>Quadrula stapes</i> )
E	Pigtoe, rough ( <i>Pleurobema plenum</i> )	E	Stork, wood (AL, FL, GA, SC) ( <i>Mycteria americana</i> )
E	Pigtoe, shiny Entire Range; Except where listed as Experimental Populations ( <i>Fusconaia cor</i> )	E	Sturgeon, Alabama ( <i>Scaphirhynchus suttkusi</i> )
XN	Pigtoe, shiny AL: Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Fusconaia cor</i> )	T	Sturgeon, gulf ( <i>Acipenser oxyrinchus desotoi</i> )
E	Pigtoe, southern ( <i>Pleurobema georgianum</i> )	T	Tortoise, gopher (W of of Mobile/Tombigbee Rs.) ( <i>Gopherus polyphemus</i> )
E	Pimpleback, orangefoot (pearlymussel) ( <i>Plethobasus cooperianus</i> )	E	Turtle, Alabama red-belly ( <i>Pseudemys alabamensis</i> )
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )	T	Turtle, flattened musk (species range clarified) ( <i>Sternotherus depressus</i> )
T	Pocketbook, finlined ( <i>Lampsilis atilis</i> )	E	Wartyback, white (pearlymussel) ( <i>Plethobasus cicatricosus</i> )
E	Pocketbook, shinyrayed ( <i>Lampsilis subangulata</i> )	E	Whale, finback ( <i>Balaenoptera physalus</i> )
E	Ring pink (mussel) ( <i>Obovaria retusa</i> )	E	Whale, humpback ( <i>Megaptera novaeangliae</i> )
E	Riversnail, Anthony's Entire Range; Except where listed as Experimental Populations ( <i>Athearnia anthonyi</i> )	E	Woodpecker, red-cockaded ( <i>Picoides borealis</i> )
XN	Riversnail, Anthony's AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Athearnia anthonyi</i> )	Plants -- 18	
T	Rocksnaail, painted ( <i>Leptoxis taeniata</i> )	T	Amphianthus, little ( <i>Amphianthus pusillus</i> )
E	Rocksnaail, plicate ( <i>Leptoxis plicata</i> )	T	Potato-bean, Price's ( <i>Apios priceana</i> )
T	Rocksnaail, round ( <i>Leptoxis ampla</i> )	T	Fern, American hart's-tongue ( <i>Asplenium scolopendrium</i> var. <i>americanum</i> )
T	Salamander, Red Hills ( <i>Phacognathus hubrichti</i> )	E	Leather flower, Morefield's ( <i>Clematis morefieldii</i> )
T	Sculpin, pygmy ( <i>Cottus paulus</i> (=pygmaeus))	E	Leather flower, Alabama ( <i>Clematis socialis</i> )
T	Sea turtle, green (except where endangered) ( <i>Chelonia mydas</i> )	E	Prairie-clover, leafy ( <i>Dalea foliosa</i> )
E	Sea turtle, hawksbill ( <i>Eretmochelys imbricata</i> )	T	Sunflower, Eggert's ( <i>Helianthus eggertii</i> )
E	Sea turtle, Kemp's ridley ( <i>Lepidochelys kempii</i> )	T	Bladderpod, lyrate ( <i>Lesquerella lyrata</i> )
E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )	T	Button, Mohr's Barbara ( <i>Marshallia mohrii</i> )
T	Sea turtle, loggerhead ( <i>Caretta caretta</i> )	E	Harperella ( <i>Ptilimnium nodosum</i> )
T	Shiner, blue ( <i>Cyprinella caerulea</i> )	T	Water-plantain, Kral's ( <i>Sagittaria secundifolia</i> )
E	Shiner, Cahaba ( <i>Notropis cahabae</i> )	E	Pitcher-plant, green ( <i>Sarracenia oreophila</i> )
E	Shiner, palezone ( <i>Notropis albizonatus</i> )	E	Pitcher-plant, Alabama canebrake ( <i>Sarracenia rubra alabamensis</i> )
E	Shrimp, Alabama cave ( <i>Palaemonias alabamae</i> )	E	Chaffseed, American ( <i>Schwalbea americana</i> )
T	Slabshell, Chipola ( <i>Elliptio chipolaensis</i> )	E	Pinkroot, gentian ( <i>Spigelia gentianoides</i> )
E	Snail, armored ( <i>Pyrgulopsis</i> (=Marstonia) <i>pachyta</i> )	T	Fern, Alabama streak-sorus ( <i>Thelypteris pilosa</i> var. <i>alabamensis</i> )
		E	Trillium, relict ( <i>Trillium reliquum</i> )
		E	Grass, Tennessee yellow-eyed ( <i>Xyris tennesseensis</i> )

## Florida - 111 listings

## Animals -- 57

T(S/A)	Alligator, American ( <i>Alligator mississippiensis</i> )	E	Manatee, West Indian ( <i>Trichechus manatus</i> )
T	Bankclimber, purple (mussel) ( <i>Elliptioideus sloatianus</i> )	E	Moccasinsheel, Gulf ( <i>Medionidus penicillatus</i> )
E	Bat, gray ( <i>Myotis grisescens</i> )	E	Moccasinsheel, Ochlockonee ( <i>Medionidus simpsonianus</i> )
E	Butterfly, Schaus swallowtail ( <i>Heraclides aristodemus ponceanus</i> )	E	Mouse, Anastasia Island beach ( <i>Peromyscus polionotus phasma</i> )
T	Caracara, Audubon's crested (FL pop.) ( <i>Polyborus plancus audubonii</i> )	E	Mouse, Choctawhatchee beach ( <i>Peromyscus polionotus allophrys</i> )
XN	Crane, whooping U.S.A. (CO, ID, FL, NM, UT, and the western half of Wyoming) ( <i>Grus americana</i> )	E	Mouse, Key Largo cotton ( <i>Peromyscus gossypinus allapaticola</i> )
E	Crocodyle, American ( <i>Crocodylus acutus</i> )	E	Mouse, Perdido Key beach ( <i>Peromyscus polionotus trissyllepsis</i> )
E	Darter, Okaloosa ( <i>Etheostoma okaloosae</i> )	T	Mouse, southeastern beach ( <i>Peromyscus polionotus niveiventris</i> )
E	Deer, key ( <i>Odocoileus virginianus clavium</i> )	E	Mouse, St. Andrew beach ( <i>Peromyscus polionotus peninsularis</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )	E	Panther, Florida ( <i>Puma</i> (=Felis) <i>concolor coryi</i> )
T	Jay, Florida scrub ( <i>Aphelocoma coerulescens</i> )	E	Pigtoe, oval ( <i>Pleurobema pyriforme</i> )
E	Kite, Everglade snail (FL pop.) ( <i>Rostrhamus sociabilis plumbeus</i> )	T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )
		E	Pocketbook, shinyrayed ( <i>Lampsilis subangulata</i> )
		T(S/A)	Puma (=mountain lion) (FL) ( <i>Puma</i> (=Felis) <i>concolor</i> (all subsp. except <i>coryi</i> ))

E	Rabbit, Lower Keys marsh <i>Sylvilagus palustris heinrichi</i>	E	Spurge, deltoid ( <i>Chamaesyce deltoidea</i> ssp. <i>deltoidea</i> )
E	Rice rat (lower FL Keys) ( <i>Oryzomys palustris natator</i> )	T	Spurge, Garber's ( <i>Chamaesyce garberi</i> )
T	Salamander, flatwoods ( <i>Ambystoma cingulatum</i> )	E	Fringe-tree, pygmy ( <i>Chionanthus pygmaeus</i> )
E	Sea turtle, green (FL, Mexico nesting pops.) ( <i>Chelonia mydas</i> )	E	Aster, Florida golden ( <i>Chrysopsis floridana</i> )
T	Sea turtle, green (except where endangered) ( <i>Chelonia mydas</i> )	E	Cladonia, Florida perforate ( <i>Cladonia perforata</i> )
E	Sea turtle, hawksbill ( <i>Eretmochelys imbricata</i> )	T	Pigeon wings ( <i>Clitoria fragrans</i> )
E	Sea turtle, Kemp's ridley ( <i>Lepidochelys kempii</i> )	E	Rosemary, short-leaved ( <i>Conradina brevifolia</i> )
E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )	E	Rosemary, Etonia ( <i>Conradina etonia</i> )
T	Sea turtle, loggerhead ( <i>Caretta caretta</i> )	E	Rosemary, Apalachicola ( <i>Conradina glabra</i> )
E	Seal, Caribbean monk ( <i>Monachus tropicalis</i> )	E	Harebells, Avon Park ( <i>Crotalaria avonensis</i> )
T	Shrimp, Squirrel Chimney Cave ( <i>Palaemonetes cummingsi</i> )	E	Gourd, Okeechobee ( <i>Cucurbita okeechobeensis</i> ssp. <i>okeechobeensis</i> )
T	Skink, bluetail mole ( <i>Eumeces egregius lividus</i> )	E	Pawpaw, beautiful ( <i>Deeringothamnus pulchellus</i> )
T	Skink, sand ( <i>Neoseps reynoldsi</i> )	E	Pawpaw, Rugel's ( <i>Deeringothamnus rugelii</i> )
T	Slabshell, Chipola ( <i>Elliptio chipolaensis</i> )	E	Mint, Garrett's ( <i>Dicerandra christmanii</i> )
T	Snail, Stock Island tree ( <i>Orthalicus reses</i> (not incl. <i>nesodryas</i> ))	E	Mint, longspurred ( <i>Dicerandra cornutissima</i> )
T	Snake, Atlantic salt marsh ( <i>Nerodia clarkii taeniata</i> )	E	Mint, scrub ( <i>Dicerandra frutescens</i> )
T	Snake, eastern indigo ( <i>Drymarchon corais couperi</i> )	E	Mint, Lakela's ( <i>Dicerandra immaculata</i> )
E	Sparrow, Cape Sable seaside ( <i>Ammodramus maritimus mirabilis</i> )	T	Buckwheat, scrub ( <i>Eriogonum longifolium</i> var. <i>gnaphalifolium</i> )
E	Sparrow, Florida grasshopper ( <i>Ammodramus savannarum floridanus</i> )	E	Snakeroot ( <i>Eryngium cuneifolium</i> )
E	Stork, wood (AL, FL, GA, SC) ( <i>Mycteria americana</i> )	T	Spurge, telephus ( <i>Euphorbia telephoides</i> )
T	Sturgeon, gulf ( <i>Acipenser oxyrinchus desotoi</i> )	E	Milkpea, Small's ( <i>Galactia smallii</i> )
E	Sturgeon, shortnose ( <i>Acipenser brevirostrum</i> )	T	Seagrass, Johnson's ( <i>Halophila johnsonii</i> )
T	Tern, roseate (Western Hemisphere except NE U.S.) ( <i>Sterna dougallii dougallii</i> )	E	Beauty, Harper's ( <i>Harperocallis flava</i> )
E	Three-ridge, fat (mussel) ( <i>Amblema neislerii</i> )	E	Hypericum, highlands scrub ( <i>Hypericum cumulicola</i> )
E	Vole, Florida salt marsh ( <i>Microtus pennsylvanicus dukecampbelli</i> )	E	Jacquemontia, beach ( <i>Jacquemontia reclinata</i> )
E	Whale, finback ( <i>Balaenoptera physalus</i> )	E	Water-willow, Cooley's ( <i>Justicia cooleyi</i> )
E	Whale, humpback ( <i>Megaptera novaeangliae</i> )	E	Biazingstar, scrub ( <i>Liatris ohlingerae</i> )
E	Whale, right ( <i>Balaena glacialis</i> (incl. <i>australis</i> ))	E	Lupine, scrub ( <i>Lupinus aridorum</i> )
E	Wolf, red (except where XN) ( <i>Canis rufus</i> )	T	Birds-in-a-nest, white ( <i>Macbridea alba</i> )
E	Woodpecker, red-cockaded ( <i>Picoides borealis</i> )	E	Beargrass, Britton's ( <i>Nolina brittoniana</i> )
E	Woodrat, Key Largo ( <i>Neotoma floridana smalli</i> )	T	Whitlow-wort, papery ( <i>Paronychia chartacea</i> )
Plants -- 54		E	Cactus, Key tree ( <i>Pilosocereus robinii</i> )
E	Lead-plant, Crenulate ( <i>Amorpha crenulata</i> )	T	Butterwort, Godfrey's ( <i>Pinguicula ionantha</i> )
E	Pawpaw, four-petal ( <i>Asimina tetramera</i> )	E	Polygala, Lewton's ( <i>Polygala lewtonii</i> )
T	Bonamia, Florida ( <i>Bonamia grandiflora</i> )	E	Polygala, tiny ( <i>Polygala smallii</i> )
E	Bellflower, Brooksville ( <i>Campanula robbinsiae</i> )	E	Wireweed ( <i>Polygonella basiramia</i> )
E	Prickly-apple, fragrant ( <i>Cereus eriophorus</i> var. <i>fragrans</i> )	E	Sandlace ( <i>Polygonella myriophylla</i> )
		E	Plum, scrub ( <i>Prunus geniculata</i> )
		E	Rhododendron, Chapman ( <i>Rhododendron chapmanii</i> )
		T	Gooseberry, Miccosukee ( <i>Ribes echinellum</i> )
		E	Chaffseed, American ( <i>Schwalbea americana</i> )
		T	Skullcap, Florida ( <i>Scutellaria floridana</i> )
		E	Campion, fringed ( <i>Silene polypetala</i> )
		E	Pinkroot, gentian ( <i>Spigelia gentianoides</i> )
		E	Meadowrue, Cooley's ( <i>Thalictrum cooleyi</i> )
		E	Torreya, Florida ( <i>Torreya taxifolia</i> )
		E	Warea, wide-leaf ( <i>Warea amplexifolia</i> )
		E	Mustard, Carter's ( <i>Warea carteri</i> )
		E	Ziziphus, Florida ( <i>Ziziphus celata</i> )

## Georgia -- 66 listings

## Animals -- 43

E	Acornshell, southern ( <i>Epioblasma othcaloogensis</i> )
T(S/A)	Alligator, American ( <i>Alligator mississippiensis</i> )
T	Bankclimber, purple (mussel) ( <i>Elliptio deusschianus</i> )
E	Bat, gray ( <i>Myotis grisescens</i> )
E	Bat, Indiana ( <i>Myotis sodalis</i> )
E	Clubshell, southern ( <i>Pleurobema decisum</i> )
E	Combshell, upland ( <i>Epioblasma metastrata</i> )
E	Darter, amber ( <i>Percina antesella</i> )

T	Darter, Cherokee ( <i>Etheostoma scotti</i> )
E	Darter, Etowah ( <i>Etheostoma etowahae</i> )
T	Darter, goldline ( <i>Percina aurolineata</i> )
T	Darter, snail ( <i>Percina tanasi</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )
E	Kidneyshell, triangular ( <i>Ptychobranchius greeni</i> )
E	Logperch, Conasauga ( <i>Percina jenkinsi</i> )
E	Manatee, West Indian ( <i>Trichechus manatus</i> )
T	Moccasinsheel, Alabama ( <i>Medionidus acutissimus</i> )
E	Moccasinsheel, Coosa ( <i>Medionidus parvulus</i> )
E	Moccasinsheel, Gulf ( <i>Medionidus penicillatus</i> )

E	Moccasinshell, Ochlockonee ( <i>Medionidus simpsonianus</i> )
XN	Mussel, oyster AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma capsaeformis</i> )
E	Pigtoe, oval ( <i>Pleurobema pyriforme</i> )
E	Pigtoe, southern ( <i>Pleurobema georgianum</i> )
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )
T	Pocketbook, finelined ( <i>Lampsilis altalis</i> )
E	Pocketbook, shinyrayed ( <i>Lampsilis subangulata</i> )
XN	Riversnail, Anthony's AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Atheurina anthonyi</i> )
T	Salamander, flatwoods ( <i>Ambystoma cingulatum</i> )
T	Sea turtle, green (except where endangered) ( <i>Chelonia mydas</i> )
E	Sea turtle, hawksbill ( <i>Eretmochelys imbricata</i> )
E	Sea turtle, Kemp's ridley ( <i>Lepidochelys kempii</i> )
E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )
T	Sea turtle, loggerhead ( <i>Caretta caretta</i> )
T	Shiner, blue ( <i>Cyprinella caerulea</i> )
T	Snake, eastern indigo ( <i>Drymarchon corais couperi</i> )
E	Stork, wood (AL, FL, GA, SC) ( <i>Mycteria americana</i> )
E	Sturgeon, shortnose ( <i>Acipenser brevirostrum</i> )
T	Tern, roseate (Western Hemisphere except NE U.S.) ( <i>Sterna dougallii dougallii</i> )
T(S/A)	Turtle, bog (=Muhlenberg) (southern) ( <i>Clemmys muhlenbergii</i> )

E	Whale, finback ( <i>Balaenoptera physalus</i> )
E	Whale, humpback ( <i>Megaptera novaeangliae</i> )
E	Whale, right ( <i>Balaena glacialis</i> (incl. <i>australis</i> ))
E	Woodpecker, red-cockaded ( <i>Picoides borealis</i> )

## Plants -- 23

T	Amphianthus, little ( <i>Amphianthus pusillus</i> )
E	Rattleweed, hairy ( <i>Baptisia arachnifera</i> )
E	Leather flower, Alabama ( <i>Clematis socialis</i> )
E	Coneflower, smooth ( <i>Echinacea laevigata</i> )
T	Pink, swamp ( <i>Helonias bullata</i> )
E	Quillwort, black spored ( <i>Isoetes melanospora</i> )
E	Quillwort, mat-forming ( <i>Isoetes tegetiformans</i> )
T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )
E	Pondberry ( <i>Lindera melissifolia</i> )
T	Button, Mohr's Barbara ( <i>Marshallia mohrii</i> )
E	Dropwort, Canby's ( <i>Oxypolis canbyi</i> )
E	Harperella ( <i>Ptilimnium nodosum</i> )
E	Sumac, Michaux's ( <i>Rhus michauxii</i> )
T	Water-plantain, Kral's ( <i>Sagittaria secundifolia</i> )
E	Pitcher-plant, green ( <i>Sarracenia oreophila</i> )
E	Chaffseed, American ( <i>Schwalbea americana</i> )
T	Skullcap, large-flowered ( <i>Scutellaria montana</i> )
E	Campion, fringed ( <i>Silene polypetala</i> )
T	Spiraea, Virginia ( <i>Spiraea virginiana</i> )
E	Torreya, Florida ( <i>Torreya taxifolia</i> )
E	Trillium, persistent ( <i>Trillium persistens</i> )
E	Trillium, relict ( <i>Trillium reliquum</i> )
E	Grass, Tennessee yellow-eyed ( <i>Xyris tennesseensis</i> )

## Kentucky -- 47 listings

## Animals -- 38

E	Bat, gray ( <i>Myotis grisescens</i> )
E	Bat, Indiana ( <i>Myotis sodalis</i> )
E	Bat, Virginia big-eared ( <i>Corynorhinus</i> (=Plecotus) <i>townsendii virginianus</i> )
E	Bean, Cumberland (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Villosa trabalis</i> )
XN	Bean, Cumberland (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Villosa trabalis</i> )
E	Blossom, tubercled (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma torulosa torulosa</i> )
XN	Blossom, tubercled (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma torulosa torulosa</i> )
E	Catspaw (=purple cat's paw pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma obliquata obliquata</i> )
XN	Catspaw (=purple cat's paw pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma obliquata obliquata</i> )
E	Clubshell Entire Range; Except where listed as Experimental Populations ( <i>Pleurobema clava</i> )

E	Combshell, Cumberlandian Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma brevidens</i> )
XN	Combshell, Cumberlandian AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma brevidens</i> )
T	Dace, blackside ( <i>Phoxinus cumberlandensis</i> )
E	Darter, duskytail Entire ( <i>Etheostoma percnurum</i> )
E	Darter, relict ( <i>Etheostoma chienense</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )
E	Elktoe, Cumberland ( <i>Alasmodonta atropurpurea</i> )
E	Fanshell ( <i>Cyprogenia stegaria</i> )
E	Mapleleaf, winged (mussel) Entire; except where listed as experimental populations ( <i>Quadrula fragosa</i> )
E	Mucket, pink (pearlymussel) ( <i>Lampsilis abrupta</i> )
E	Mussel, oyster Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma capsaeformis</i> )
XN	Mussel, oyster AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma capsaeformis</i> )
E	Pearlymussel, cracking Entire Range; Except where listed as Experimental Populations ( <i>Hemistena lata</i> )
E	Pearlymussel, dromedary Entire Range; Except where listed as Experimental Populations ( <i>Dromus dromas</i> )
E	Pearlymussel, littlewing ( <i>Pegias fabula</i> )
E	Pigtoe, rough ( <i>Pleurobema plenum</i> )

E	Pimpleback, orangefoot (pearlymussel) ( <i>Plethobasus cooperianus</i> )
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )
E	Pocketbook, fat ( <i>Potamilus capax</i> )
E	Puma (=cougar), eastern ( <i>Puma</i> (=Felis) concolor cougar)
E	Riffleshell, northern ( <i>Epioblasma torulosa</i> rangiana)
E	Riffleshell, tan ( <i>Epioblasma florentina walkeri</i> (=E. walkeri))
E	Ring pink (mussel) ( <i>Obovaria retusa</i> )
E	Shiner, palezone ( <i>Notropis albizonatus</i> )
E	Shrimp, Kentucky cave ( <i>Palaemonias ganteri</i> )
E	Sturgeon, pallid ( <i>Scaphirhynchus albus</i> )

E	Tern, least (interior pop.) ( <i>Sterna antillarum</i> )
E	Wartyback, white (pearlymussel) ( <i>Plethobasus</i> cicatricosus)

## Plants -- 9

T	Potato-bean, Price's ( <i>Apios priceana</i> )
E	Rock-cress, Braun's ( <i>Arabis perstellata</i> )
E	Sandwort, Cumberland ( <i>Arenaria</i> cumberlandensis)
T	Rosemary, Cumberland ( <i>Conradina verticillata</i> )
T	Sunflower, Eggert's ( <i>Helianthus eggertii</i> )
T	Goldenrod, white-haired ( <i>Solidago albopilosa</i> )
E	Goldenrod, Short's ( <i>Solidago shortii</i> )
T	Spiraea, Virginia ( <i>Spiraea virginiana</i> )
E	Clover, running buffalo ( <i>Trifolium stoloniferum</i> )

## Maine -- 15 listings

## Animals -- 12

T	Eagle, bald (lower 48 States) ( <i>Haliaeetus</i> leucocephalus)
T	Lynx, Canada (lower 48 States DPS) ( <i>Lynx</i> canadensis)
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )
E	Puma (=cougar), eastern ( <i>Puma</i> (=Felis) concolor cougar)
E	Salmon, Atlantic Gulf of Maine Atlantic Salmon DPS ( <i>Salmo salar</i> )
E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )

E	Sturgeon, shortnose ( <i>Acipenser brevirostrum</i> )
E	Tern, roseate (northeast U.S. nesting pop.) ( <i>Sterna</i> dougallii dougallii)
E	Whale, finback ( <i>Balaenoptera physalus</i> )
E	Whale, humpback ( <i>Megaptera novaeangliae</i> )
E	Whale, right ( <i>Balaena glacialis</i> (incl. australis))
T	Wolf, gray Eastern Distinct Population Segment ( <i>Canis lupus</i> )

## Plants -- 3

T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )
E	Lousewort, Furbish ( <i>Pedicularis furbishiae</i> )
T	Orchid, eastern prairie fringed ( <i>Platanthera</i> leucophaea)

## Maryland -- 26 listings

## Animals -- 19

E	Bat, Indiana ( <i>Myotis sodalis</i> )
E	Darter, Maryland ( <i>Etheostoma sellare</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus</i> leucocephalus)
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )
E	Puma (=cougar), eastern ( <i>Puma</i> (=Felis) concolor cougar)
T	Sea turtle, green (except where endangered) ( <i>Chelonia mydas</i> )
E	Sea turtle, hawksbill ( <i>Eretmochelys imbricata</i> )
E	Sea turtle, Kemp's ridley ( <i>Lepidochelys kempii</i> )
E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )
T	Sea turtle, loggerhead ( <i>Caretta caretta</i> )
E	Squirrel, Delmarva Peninsula fox (except Sussex Co., DE) ( <i>Sciurus niger cinereus</i> )

E	Sturgeon, shortnose ( <i>Acipenser brevirostrum</i> )
T	Tiger beetle, northeastern beach ( <i>Cicindela</i> dorsalis dorsalis)
T	Tiger beetle, Puritan ( <i>Cicindela puritana</i> )
T	Turtle, bog (=Muhlenberg) (northern) ( <i>Clemmys</i> muhlenbergii)
E	Wedgemussel, dwarf ( <i>Alasmidonta heterodon</i> )
E	Whale, finback ( <i>Balaenoptera physalus</i> )
E	Whale, humpback ( <i>Megaptera novaeangliae</i> )
E	Whale, right ( <i>Balaena glacialis</i> (incl. australis))

## Plants -- 7

T	Joint-vetch, sensitive ( <i>Aeschynomene virginica</i> )
E	Gerardia, sandplain ( <i>Agalinis acuta</i> )
T	Amaranth, seabeach ( <i>Amaranthus pumilus</i> )
T	Pink, swamp ( <i>Helonias bullata</i> )
E	Dropwort, Canby's ( <i>Oxypolis canbyi</i> )
E	Harperella ( <i>Ptilimnium nodosum</i> )
E	Bulrush, Northeastern ( <i>Scirpus ancistrochaetus</i> )

## Massachusetts -- 24 listings

## Animals -- 21

E	Beetle, American burying ( <i>Nicrophorus</i> americanus)
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus</i> leucocephalus)

T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )
E	Puma (=cougar), eastern ( <i>Puma</i> (=Felis) concolor cougar)
E	Sea turtle, hawksbill ( <i>Eretmochelys imbricata</i> )
E	Sea turtle, Kemp's ridley ( <i>Lepidochelys kempii</i> )
E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )
T	Sea turtle, loggerhead ( <i>Caretta caretta</i> )



E	Sturgeon, shortnose ( <i>Acipenser brevirostrum</i> )
E	Tern, roseate (northeast U.S. nesting pop.) ( <i>Sterna dougallii dougallii</i> )
T	Tiger beetle, northeastern beach ( <i>Cicindela dorsalis dorsalis</i> )
T	Tiger beetle, Puritan ( <i>Cicindela puritana</i> )
T	Turtle, bog (=Muhlenberg) (northern) ( <i>Clemmys muhlenbergii</i> )
E	Turtle, Plymouth redbelly ( <i>Pseudemys rubriventris bangsi</i> )
E	Wedgemussel, dwarf ( <i>Alasmidonta heterodon</i> )
E	Whale, blue ( <i>Balaenoptera musculus</i> )

E	Whale, finback ( <i>Balaenoptera physalus</i> )
E	Whale, humpback ( <i>Megaptera novaeangliae</i> )
E	Whale, right ( <i>Balaena glacialis</i> (incl. <i>australis</i> ))
E	Whale, Sei ( <i>Balaenoptera borealis</i> )
T	Wolf, gray Eastern Distinct Population Segment ( <i>Canis lupus</i> )

## Plants -- 3

E	Gerardia, sandplain ( <i>Agalinis acuta</i> )
T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )
E	Bulrush, Northeastern ( <i>Scirpus ancistrochaetus</i> )

## New Hampshire -- 13 listings

## Animals -- 10

E	Butterfly, Karner blue ( <i>Lycaeides melissa samuelis</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )
T	Lynx, Canada (lower 48 States DPS) ( <i>Lynx canadensis</i> )
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )
E	Puma (=cougar), eastern (Puma (=Felis) concolor cougar)

E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )
T	Tiger beetle, Puritan ( <i>Cicindela puritana</i> )
E	Wedgemussel, dwarf ( <i>Alasmidonta heterodon</i> )
E	Whale, finback ( <i>Balaenoptera physalus</i> )
T	Wolf, gray Eastern Distinct Population Segment ( <i>Canis lupus</i> )

## Plants -- 3

E	Milk-vetch, Jesup's ( <i>Astragalus robbinsii</i> var. <i>jesupi</i> )
T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )
E	Bulrush, Northeastern ( <i>Scirpus ancistrochaetus</i> )

## New Jersey -- 23 listings

## Animals -- 17

E	Bat, Indiana ( <i>Myotis sodalis</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )
E	Puma (=cougar), eastern (Puma (=Felis) concolor cougar)
E	Sea turtle, hawksbill ( <i>Eretmochelys imbricata</i> )
E	Sea turtle, Kemp's ridley ( <i>Lepidochelys kempii</i> )
E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )
T	Sea turtle, loggerhead ( <i>Caretta caretta</i> )
E	Sturgeon, shortnose ( <i>Acipenser brevirostrum</i> )
E	Tern, roseate (northeast U.S. nesting pop.) ( <i>Sterna dougallii dougallii</i> )
T	Tiger beetle, northeastern beach ( <i>Cicindela dorsalis dorsalis</i> )

T	Turtle, bog (=Muhlenberg) (northern) ( <i>Clemmys muhlenbergii</i> )
E	Wedgemussel, dwarf ( <i>Alasmidonta heterodon</i> )
E	Whale, finback ( <i>Balaenoptera physalus</i> )
E	Whale, humpback ( <i>Megaptera novaeangliae</i> )
E	Whale, right ( <i>Balaena glacialis</i> (incl. <i>australis</i> ))
T	Wolf, gray Eastern Distinct Population Segment ( <i>Canis lupus</i> )

## Plants -- 6

T	Joint-vetch, sensitive ( <i>Aeschynomene virginica</i> )
T	Amaranth, seabeach ( <i>Amaranthus pumilus</i> )
T	Pink, swamp ( <i>Helonias bullata</i> )
T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )
T	Beaked-rush, Knieskern's ( <i>Rhynchospora knieskernii</i> )
E	Chaffseed, American ( <i>Schwalbea Americana</i> )

## New York -- 27 listings

## Animals -- 21

E	Bat, Indiana ( <i>Myotis sodalis</i> )
E	Butterfly, Karner blue ( <i>Lycaeides melissa samuelis</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )
T	Lynx, Canada (lower 48 States DPS) ( <i>Lynx canadensis</i> )

E	Plover, piping (Great Lakes watershed) ( <i>Charadrius melodus</i> )
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )
E	Puma (=cougar), eastern (Puma (=Felis) concolor cougar)
T	Sea turtle, green (except where endangered) ( <i>Chelonia mydas</i> )
E	Sea turtle, hawksbill ( <i>Eretmochelys imbricata</i> )
E	Sea turtle, Kemp's ridley ( <i>Lepidochelys kempii</i> )
E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )
T	Sea turtle, loggerhead ( <i>Caretta caretta</i> )

T	Snail, Chittenango ovate amber ( <i>Succinea chittenangoensis</i> )
E	Sturgeon, shortnose ( <i>Acipenser brevirostrum</i> )
E	Tern, roseate (northeast U.S. nesting pop.) ( <i>Sterna dougallii dougallii</i> )
T	Turtle, bog (=Muhlenberg) (northern) ( <i>Clemmys muhlenbergii</i> )
E	Wedgemussel, dwarf ( <i>Alasmidonta heterodon</i> )
E	Whale, finback ( <i>Balaenoptera physalus</i> )
E	Whale, humpback ( <i>Megaptera novaeangliae</i> )
E	Whale, right ( <i>Balaena glacialis</i> (incl. <i>australis</i> ))
T	Wolf, gray Eastern Distinct Population Segment ( <i>Canis lupus</i> )

## Plants -- 6

T	Monkshood, northern wild ( <i>Aconitum noveboracense</i> )
E	Gerardia, sandplain ( <i>Agalinis acuta</i> )
T	Amaranth, seabeach ( <i>Amaranthus pumilus</i> )
T	Fern, American hart's-tongue ( <i>Asplenium scolopendrium</i> var. <i>americanum</i> )
T	Roseroot, Leedy's ( <i>Sedum integrifolium</i> ssp. <i>leedyi</i> )
T	Goldenrod, Houghton's ( <i>Solidago houghtonii</i> )

## North Carolina -- 63 listings

## Animals -- 36

T	Alligator, American ( <i>Alligator mississippiensis</i> )
E	Bat, Indiana ( <i>Myotis sodalis</i> )
E	Bat, Virginia big-eared ( <i>Corynorhinus</i> (= <i>Plecotus</i> ) <i>townsendii virginianus</i> )
E	Butterfly, Saint Francis' satyr ( <i>Neonympha mitchellii francisci</i> )
T	Chub, spotfin Entire ( <i>Cyprinella monacha</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )
E	Elktoe, Appalachian ( <i>Alasmidonta raveneliana</i> )
E	Heelsplitter, Carolina ( <i>Lasmigona decorata</i> )
XN	Mussel, oyster AL: Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma capsaeformis</i> )
E	Pearllymussel, littlewing ( <i>Pegias fabula</i> )
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )
E	Puma (=cougar), eastern ( <i>Puma</i> (= <i>Felis</i> ) <i>concolor cougar</i> )
T	Sea turtle, green (except where endangered) ( <i>Chelonia mydas</i> )
E	Sea turtle, hawksbill ( <i>Eretmochelys imbricata</i> )
E	Sea turtle, Kemp's ridley ( <i>Lepidochelys kempii</i> )
E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )
T	Sea turtle, loggerhead ( <i>Caretta caretta</i> )
E	Shiner, Cape Fear ( <i>Notropis mekistocholas</i> )
T	Silverside, Waccamaw ( <i>Menidia extensa</i> )
T	Snail, noonday ( <i>Mesodon clarki nantahala</i> )
E	Spider, spruce-fir moss ( <i>Microhexura montivaga</i> )
E	Spiny mussel, James ( <i>Pleurobema collina</i> )
E	Spiny mussel, Tar River ( <i>Elliptio steinstansana</i> )
E	Squirrel, Carolina northern flying ( <i>Glaucomys sabrinus coloratus</i> )
E	Sturgeon, shortnose ( <i>Acipenser brevirostrum</i> )
E	Tern, roseate (northeast U.S. nesting pop.) ( <i>Sterna dougallii dougallii</i> )
T	Tern, roseate (Western Hemisphere except NE U.S.) ( <i>Sterna dougallii dougallii</i> )

T	Turtle, bog (=Muhlenberg) (southern) ( <i>Clemmys muhlenbergii</i> )
E	Wedgemussel, dwarf ( <i>Alasmidonta heterodon</i> )
E	Whale, finback ( <i>Balaenoptera physalus</i> )
E	Whale, humpback ( <i>Megaptera novaeangliae</i> )
E	Whale, right ( <i>Balaena glacialis</i> (incl. <i>australis</i> ))
E	Whale, sperm ( <i>Physeter catodon</i> (= <i>macrocephalus</i> ))
E	Wolf, red (except where XN) ( <i>Canis rufus</i> )
XN	Wolf, red [XN] ( <i>Canis rufus</i> )
E	Woodpecker, red-cockaded ( <i>Picoides borealis</i> )

## Plants -- 27

T	Joint-vetch, sensitive ( <i>Aeschynomene virginica</i> )
T	Amaranth, seabeach ( <i>Amaranthus pumilus</i> )
E	Bittercress, small-anthered ( <i>Cardamine micranthera</i> )
E	Sedge, golden ( <i>Carex lutea</i> )
E	Coneflower, smooth ( <i>Echinacea laevigata</i> )
E	Avens, spreading ( <i>Geum radiatum</i> )
E	Lichen, rock gnome ( <i>Gymnoderma lineare</i> )
E	Bluet, Roan Mountain ( <i>Hedyotis purpurea</i> var. <i>mo</i> )
E	Sunflower, Schweinitz's ( <i>Helianthus schweinitzii</i> )
T	Pink, swamp ( <i>Helonias bullata</i> )
T	Heartleaf, dwarf-flowered ( <i>Hexastylis naniflora</i> )
T	Heather, mountain golden ( <i>Hudsonia montana</i> )
T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )
T	Blazingstar, Heller's ( <i>Liatris helleri</i> )
E	Pondberry ( <i>Lindera melissifolia</i> )
E	Loosestrife, rough-leaved ( <i>Lysimachia asperulaefolia</i> )
E	Dropwort, Canby's ( <i>Oxypolis canbyi</i> )
E	Harperella ( <i>Prilimnium nodosum</i> )
E	Sumac, Michaux's ( <i>Rhus michauxii</i> )
E	Arrowhead, bunched ( <i>Sagittaria fasciculata</i> )
E	Pitcher-plant, green ( <i>Sarracenia oreophila</i> )
E	Pitcher-plant, mountain sweet ( <i>Sarracenia rubra</i> s. <i>jonesii</i> )
E	Chaffseed, American ( <i>Schwalbea americana</i> )
E	Irisette, white ( <i>Sisyrinchium dichotomum</i> )
T	Goldenrod, Blue Ridge ( <i>Solidago spithamea</i> )
T	Spiraea, Virginia ( <i>Spiraea virginiana</i> )
E	Meadowrue, Cooley's ( <i>Thalictrum cooleyi</i> )

## Ohio -- 26 listings

## Animals -- 20

E	Bat, Indiana ( <i>Myotis sodalis</i> )
E	Beetle, American burying ( <i>Nicrophorus americanus</i> )

E	Butterfly, Kerner blue ( <i>Lycaides melissa samuelis</i> )
E	Butterfly, Mitchell's satyr ( <i>Neonympha mitchellii mitchellii</i> )
E	Catspaw (=purple cat's paw pearl mussel) Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma obliquata obliquata</i> )

XN	Catspaw (=purple cat's paw pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma obliquata obliquata</i> )	E	Puma (=cougar), eastern ( <i>Puma (=Felis) concolor cougar</i> )
E	Catspaw, white (pearlymussel) ( <i>Epioblasma obliquata perobliqua</i> )	E	Riffleshell, northern ( <i>Epioblasma torulosa rangiana</i> )
E	Clubshell Entire Range; Except where listed as Experimental Populations ( <i>Pleurobema clava</i> )	T	Snake, copperbelly water (MI, OH, IN N of 40° N. Lat.) ( <i>Nerodia erythrogaster neglecta</i> )
E	Dragonfly, Hine's emerald ( <i>Somatochlora hineana</i> )	T	Snake, Lake Erie water (subspecies range clarified) ( <i>Nerodia sipedon insularum</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )	T	Wolf, gray Eastern Distinct Population Segment ( <i>Canis lupus</i> )
E	Fanshell ( <i>Cyprogenia stegaria</i> )	Plants -- 6	
E	Madtom, Scioto ( <i>Noturus trautmani</i> )	T	Monkshood, northern wild ( <i>Aconitum noveboracense</i> )
E	Mucket, pink (pearlymussel) ( <i>Lampsilis abrupta</i> )	T	Daisy, lakeside ( <i>Hymenoxys herbacea</i> )
E	Plover, piping (Great Lakes watershed) ( <i>Charadrius melodus</i> )	T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )	T	Orchid, eastern prairie fringed ( <i>Platanthera leucophaea</i> )
		T	Spiraea, Virginia ( <i>Spiraea virginiana</i> )
		E	Clover, running buffalo ( <i>Trifolium stoloniferum</i> )

## Pennsylvania -- 17 listings

## Animals -- 14

E	Bat, Indiana ( <i>Myotis sodalis</i> )	E	Puma (=cougar), eastern ( <i>Puma (=Felis) concolor cougar</i> )
E	Clubshell Entire Range; Except where listed as Experimental Populations ( <i>Pleurobema clava</i> )	E	Riffleshell, northern ( <i>Epioblasma torulosa rangiana</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )	E	Ring pink (mussel) ( <i>Obovaria retusa</i> )
E	Mucket, pink (pearlymussel) ( <i>Lampsilis abrupta</i> )	T	Turtle, bog (=Muhlenberg) (northern) ( <i>Clemmys muhlenbergii</i> )
E	Pearlymussel, cracking Entire Range; Except where listed as Experimental Populations ( <i>Hemistena lata</i> )	E	Wedgemussel, dwarf ( <i>Alasmidonta heterodon</i> )
E	Pigtoe, rough ( <i>Pleurobema plenum</i> )	T	Wolf, gray Eastern Distinct Population Segment ( <i>Canis lupus</i> )
E	Pimpleback, orangefoot (pearlymussel) ( <i>Plethobasus cooperianus</i> )	Plants -- 3	
E	Plover, piping (Great Lakes watershed) ( <i>Charadrius melodus</i> )	T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )
		E	Bulrush, Northeastern ( <i>Scirpus ancistrochaetus</i> )
		T	Spiraea virginia ( <i>Spiraea virginiana</i> )

## South Carolina -- 42 listings

## Animals -- 22

T	Alligator, American ( <i>Alligator mississippiensis</i> )	E	Stork, wood (AL, FL, GA, SC) ( <i>Mycteria americana</i> )
E	Bat, Indiana ( <i>Myotis sodalis</i> )	E	Sturgeon, shortnose ( <i>Acipenser brevirostrum</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )	T	Tern, roseate (Western Hemisphere except NE U.S.) ( <i>Sterna dougallii dougallii</i> )
E	Heelsplitter, Carolina ( <i>Lasmigona decorata</i> )	T	Turtle, bog (=Muhlenberg) (southern) ( <i>Clemmys muhlenbergii</i> )
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )	E	Whale, finback ( <i>Balaenoptera physalus</i> )
E	Puma (=cougar), eastern ( <i>Puma (=Felis) concolor cougar</i> )	E	Whale, humpback ( <i>Megaptera novaeangliae</i> )
T	Salamander, flatwoods ( <i>Ambystoma cingulatum</i> )	E	Whale, right ( <i>Balaena glacialis (incl. australis)</i> )
T	Sea turtle, green (except where endangered) ( <i>Chelonia mydas</i> )	E	Wolf, red (except where XN) ( <i>Canis rufus</i> )
E	Sea turtle, hawksbill ( <i>Eretmochelys imbricata</i> )	E	Woodpecker, red-cockaded ( <i>Picoides borealis</i> )
E	Sea turtle, Kemp's ridley ( <i>Lepidochelys kempii</i> )	Plants -- 20	
E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )	T	Amaranth, seabeach ( <i>Amaranthus pumilus</i> )
T	Sea turtle, loggerhead ( <i>Caretta caretta</i> )	T	Amphianthus, little ( <i>Amphianthus pusillus</i> )
T	Snake, eastern indigo ( <i>Drymarchon corais couperi</i> )	E	Coneflower, smooth ( <i>Echinacea laevigata</i> )
		E	Sunflower, Schweinitz's ( <i>Helianthus schweinitzii</i> )
		T	Pink, swamp ( <i>Helonias bullata</i> )
		T	Heartleaf, dwarf-flowered ( <i>Hexastylis naniflora</i> )
		E	Quillwort, black spored ( <i>Isoetes melanospora</i> )

T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )	E	Arrowhead, bunched ( <i>Sagittaria fasciculata</i> )
E	Pondberry ( <i>Lindera melissifolia</i> )	E	Pitcher-plant, mountain sweet ( <i>Sarracenia rubra</i> ssp. <i>jonesii</i> )
E	Loosestrife, rough-leaved ( <i>Lysimachia asperulaefolia</i> )	E	Chaffseed, American ( <i>Schwalbea americana</i> )
E	Dropwort, Canby's ( <i>Oxypolis canbyi</i> )	E	Irisette, white ( <i>Sisyrinchium dichotomum</i> )
E	Harperella ( <i>Ptilimnium nodosum</i> )	E	Trillium, persistent ( <i>Trillium persistens</i> )
E	Sumac, Michaux's ( <i>Rhus michauxii</i> )	E	Trillium, relict ( <i>Trillium reliquum</i> )
T	Gooseberry, Miccosukee ( <i>Ribes echinellum</i> )		

## Tennessee -- 96 listings

## Animals -- 76

E	Acornshell, southern ( <i>Epioblasma othcaloogensis</i> )	T	Dace, blackside ( <i>Phoxinus Cumberlandensis</i> )
E	Bat, gray ( <i>Myotis grisescens</i> )	E	Darter, amber ( <i>Percina antesella</i> )
E	Bat, Indiana ( <i>Myotis sodalis</i> )	E	Darter, bluemark (=jewel) ( <i>Etheostoma /</i> )
E	Bean, Cumberland (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Villosa trabalis</i> )	E	Darter, boulder ( <i>Etheostoma wapiti</i> )
XN	Bean, Cumberland (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Villosa trabalis</i> )	E	Darter, duskytail Entire ( <i>Etheostoma percnurum</i> )
E	Bean, purple ( <i>Villosa perpurpurea</i> )	T	Darter, slackwater ( <i>Etheostoma boschungii</i> )
E	Blossom, green (pearlymussel) ( <i>Epioblasma torulosa gubernaculum</i> )	T	Darter, snail ( <i>Percina tanasi</i> )
E	Blossom, tubercled (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma torulosa torulosa</i> )	T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )
XN	Blossom, tubercled (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma torulosa torulosa</i> )	E	Elktoe, Appalachian ( <i>Alasmodonta raveneliana</i> )
E	Blossom, turgid (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma turgidula</i> )	E	Elktoe, Cumberland ( <i>Alasmodonta atropurpurea</i> )
XN	Blossom, turgid (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma turgidula</i> )	E	Fanshell ( <i>Cyprogenia stegaria</i> )
E	Blossom, yellow (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma florentina florentina</i> )	E	Kidneyshell, triangular ( <i>Ptychobranthus greeni</i> )
XN	Blossom, yellow (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma florentina florentina</i> )	E	Lampmussel, Alabama Entire Range; Except where listed as Experimental Populations ( <i>Lampsilis virescens</i> )
E	Catspaw (=purple cat's paw pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma obliquata obliquata</i> )	E	Lilliput, pale (pearlymussel) ( <i>Toxolasma cylindrellus</i> )
XN	Catspaw (=purple cat's paw pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma obliquata obliquata</i> )	E	Logperch, Conasauga ( <i>Percina jenkinsi</i> )
T	Chub, slender ( <i>Erimystax cahni</i> )	E	Madtom, pygmy ( <i>Noturus stanauli</i> )
T	Chub, spotfin Entire ( <i>Cyprinella monacha</i> )	E	Madtom, smoky Entire ( <i>Noturus baileyi</i> )
E	Combshell, Cumberlandian Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma brevidens</i> )	XN	Madtom, yellowfin Holston River, VA, TN ( <i>Noturus flavipinnis</i> )
XN	Combshell, Cumberlandian AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma brevidens</i> )	T	Madtom, yellowfin (except where XN) ( <i>Noturus flavipinnis</i> )
E	Combshell, upland ( <i>Epioblasma metastrata</i> )	E	Mapleleaf, winged (mussel) Entire; except where listed as experimental populations ( <i>Quadrula fragosa</i> )
E	Crayfish, Nashville ( <i>Orconectes shoupi</i> )	E	Marstonia, royal (snail) ( <i>Pyrgulopsis ogmorhaphes</i> )
		E	Moccasinshell, Coosa ( <i>Medionidus parvulus</i> )
		E	Monkeyface, Appalachian (pearlymussel) ( <i>Quadrula sparsa</i> )
		E	Monkeyface, Cumberland (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Quadrula intermedia</i> )
		XN	Monkeyface, Cumberland (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Quadrula intermedia</i> )
		E	Mucket, pink (pearlymussel) ( <i>Lampsilis abrupta</i> )
		E	Mussel, oyster Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma capsaeformis</i> )
		XN	Mussel, oyster AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma capsaeformis</i> )
		E	Pearlymussel, birdwing Entire Range; Except where listed as Experimental Populations ( <i>Conradilla caelata</i> )
		E	Pearlymussel, cracking Entire Range; Except where listed as Experimental Populations ( <i>Hemistena lata</i> )
		E	Pearlymussel, dromedary Entire Range; Except where listed as Experimental Populations ( <i>Dromus dromas</i> )

E	Pearlymussel, littlewing ( <i>Pegias fabula</i> )	E	Spider, spruce-fir moss ( <i>Microhexura montivaga</i> )
E	Pigtoe, Cumberland ( <i>Pleurobema gibberum</i> )	E	Squirrel, Carolina northern flying ( <i>Glaucomys sabrinus coloratus</i> )
E	Pigtoe, finereyed Entire Range; Except where listed as Experimental Populations ( <i>Fusconaia cuneolus</i> )	E	Sturgeon, pallid ( <i>Scaphirhynchus albus</i> )
XN	Pigtoe, finereyed AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Fusconaia cuneolus</i> )	E	Tern, least (interior pop.) ( <i>Sterna antillarum</i> )
E	Pigtoe, rough ( <i>Pleurobema plenum</i> )	E	Wartyback, white (pearlymussel) ( <i>Plethobasus cicatricosus</i> )
E	Pigtoe, shiny Entire Range; Except where listed as Experimental Populations ( <i>Fusconaia cor</i> )	XN	Wolf, red [XN] ( <i>Canis rufus</i> )
XN	Pigtoe, shiny AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Fusconaia cor</i> )	Plants -- 20	
E	Pigtoe, southern ( <i>Pleurobema georgianum</i> )	T	Potato-bean, Price's ( <i>Apios priceana</i> )
E	Pimpleback, orangefoot (pearlymussel) ( <i>Plethobasus cooperianus</i> )	E	Rock-cress, Braun's ( <i>Arabis perstellata</i> )
T	Pocketbook, finelined ( <i>Lampsilis altalis</i> )	E	Sandwort, Cumberland ( <i>Arenaria cumberlandensis</i> )
E	Puma (=cougar), eastern ( <i>Puma</i> (=Felis) concolor cougar)	T	Fern, American hart's-tongue ( <i>Asplenium scolopendrium</i> var. <i>americanum</i> )
E	Rabbitsfoot, rough ( <i>Quadrula cylindrica strigillata</i> )	E	Ground-plum, Guthrie's (=Pyne's) ( <i>Astragalus bibullatus</i> )
E	Riffleshell, tan ( <i>Epioblasma florentina walkeri</i> (=E. walkeri))	T	Rosemary, Cumberland ( <i>Conradina verticillata</i> )
E	Ring pink (mussel) ( <i>Obovaria retusa</i> )	E	Prairie-clover, leafy ( <i>Dalea foliosa</i> )
E	Riversnail, Anthony's Entire Range; Except where listed as Experimental Populations ( <i>Athearnia anthonyi</i> )	E	Coneflower, Tennessee purple ( <i>Echinacea tennesseensis</i> )
XN	Riversnail, Anthony's AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Athearnia anthonyi</i> )	E	Avens, spreading ( <i>Geum radiatum</i> )
T	Shiner, blue ( <i>Cyprinella caerulea</i> )	E	Lichen, rock gnome ( <i>Gymnoderma lineare</i> )
T	Snail, painted snake coiled forest ( <i>Anguispira picta</i> )	E	Bluet, Roan Mountain ( <i>Hedyotis purpurea</i> var. <i>montana</i> )
		T	Sunflower, Eggert's ( <i>Helianthus eggertii</i> )
		T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )
		E	Bladderpod, Spring Creek ( <i>Lesquerella perforata</i> )
		E	Aster, Ruth's golden ( <i>Pityopsis ruthii</i> )
		E	Pitcher-plant, green ( <i>Sarracenia oreophila</i> )
		T	Skullcap, large-flowered ( <i>Scutellaria montana</i> )
		T	Goldenrod, Blue Ridge ( <i>Solidago spithamea</i> )
		T	Spiraea, Virginia ( <i>Spiraea virginiana</i> )
		E	Grass, Tennessee yellow-eyed ( <i>Xyris tennesseensis</i> )

## Vermont -- 9 listings

## Animals -- 7

E	Bat, Indiana ( <i>Myotis sodalis</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )
T	Lynx, Canada (lower 48 States DPS) ( <i>Lynx canadensis</i> )
E	Puma (=cougar), eastern ( <i>Puma</i> (=Felis) concolor cougar)

T	Tiger beetle, Puritan ( <i>Cicindela puritana</i> )
E	Wedgemussel, dwarf ( <i>Alasmidonta heterodon</i> )
T	Wolf, gray Eastern Distinct Population Segment ( <i>Canis lupus</i> )

## Plants -- 2

E	Milk-vetch, Jesup's ( <i>Astragalus robbinsii</i> var. <i>jesupi</i> )
E	Bulrush, Northeastern ( <i>Scirpus ancistrochaetus</i> )

## Virginia -- 71 listings

## Animals -- 56

E	Bat, gray ( <i>Myotis grisescens</i> )
E	Bat, Indiana ( <i>Myotis sodalis</i> )
E	Bat, Virginia big-eared ( <i>Corynorhinus</i> (=Plecotus) <i>townsendii virginianus</i> )
XN	Bean, Cumberland (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Villosa trabalis</i> )
E	Bean, purple ( <i>Villosa perpurpurea</i> )
E	Blossom, green (pearlymussel) ( <i>Epioblasma torulosa gubernaculum</i> )

T	Chub, slender ( <i>Erimystax cahni</i> )
T	Chub, spotfin Entire ( <i>Cyprinella monacha</i> )
E	Combshell, Cumberlandian Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma brevidens</i> )
XN	Combshell, Cumberlandian AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma brevidens</i> )
E	Darter, duskytail Entire ( <i>Etheostoma percnurum</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )
E	Fanshell ( <i>Cyprogenia stegaria</i> )
E	Isopod, Lee County cave ( <i>Lirceus usdagalun</i> )
T	Isopod, Madison Cave ( <i>Antrolana lira</i> )

E	Logperch, Roanoke ( <i>Percina rex</i> )
XN	Madtom, yellowfin Holston River, VA, TN ( <i>Noturus flavipinnis</i> )
T	Madtom, yellowfin (except where XN) ( <i>Noturus flavipinnis</i> )
E	Monkeyface, Appalachian (pearlymussel) ( <i>Quadrula sparsa</i> )
E	Monkeyface, Cumberland (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Quadrula intermedia</i> )
XN	Monkeyface, Cumberland (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Quadrula intermedia</i> )
E	Mucket, pink (pearlymussel) ( <i>Lampsilis abrupta</i> )
E	Mussel, oyster Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma capsaeformis</i> )
XN	Mussel, oyster AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma capsaeformis</i> )
E	Pearlymussel, birdwing Entire Range; Except where listed as Experimental Populations ( <i>Conradilla caelata</i> )
E	Pearlymussel, cracking Entire Range; Except where listed as Experimental Populations ( <i>Hemistena lata</i> )
E	Pearlymussel, dromedary Entire Range; Except where listed as Experimental Populations ( <i>Dromus dromas</i> )
E	Pearlymussel, littlewing ( <i>Pegias fabula</i> )
E	Pigtoe, finereyed Entire Range; Except where listed as Experimental Populations ( <i>Fusconaia cuneolus</i> )
XN	Pigtoe, finereyed AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Fusconaia cuneolus</i> )
E	Pigtoe, rough ( <i>Pleurobema plenum</i> )
E	Pigtoe, shiny Entire Range; Except where listed as Experimental Populations ( <i>Fusconaia cor</i> )
XN	Pigtoe, shiny AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Fusconaia cor</i> )
T	Plover, piping (except Great Lakes watershed) ( <i>Charadrius melodus</i> )
E	Puma (=cougar), eastern ( <i>Puma</i> (=Felis) concolor cougar)

E	Rabbitsfoot, rough ( <i>Quadrula cylindrica strigillata</i> )
E	Riffleshell, tan ( <i>Epioblasma florentina walkeri</i> (=E. walkeri))
E	Salamander, Shenandoah ( <i>Plethodon shenandoah</i> )
T	Sea turtle, green (except where endangered) ( <i>Chelonia mydas</i> )
E	Sea turtle, hawksbill ( <i>Eretmochelys imbricata</i> )
E	Sea turtle, Kemp's ridley ( <i>Lepidochelys kempii</i> )
E	Sea turtle, leatherback ( <i>Dermochelys coriacea</i> )
T	Sea turtle, loggerhead ( <i>Caretta caretta</i> )
E	Snail, Virginia fringed mountain ( <i>Polygyriscus virginianus</i> )
E	Spinymussel, James ( <i>Pleurobema collina</i> )
E	Squirrel, Delmarva Peninsula fox (except Sussex Co., DE) ( <i>Sciurus niger cinereus</i> )
E	Squirrel, Virginia northern flying ( <i>Glaucomys sabrinus fuscus</i> )
E	Sturgeon, shortnose ( <i>Acipenser brevirostrum</i> )
E	tern, roseate (northeast U.S. nesting pop.) ( <i>Sterna dougallii dougallii</i> )
T	Tiger beetle, northeastern beach ( <i>Cicindela dorsalis dorsalis</i> )
T(S/A)	Turtle, bog (=Muhlenberg) (southern) ( <i>Clemmys muhlenbergii</i> )
E	Wedgemussel, dwarf ( <i>Alasmodonta heterodon</i> )
E	Whale, finback ( <i>Balaenoptera physalus</i> )
E	Whale, humpback ( <i>Megaptera novaeangliae</i> )
E	Whale, right ( <i>Balaena glacialis</i> (incl. australis))
E	Woodpecker, red-cockaded ( <i>Picoides borealis</i> )

## Plants -- 15

T	Joint-vetch, sensitive ( <i>Aeschynomene virginica</i> )
T	Amaranth, seabeach ( <i>Amaranthus pumilus</i> )
E	Rock-cress, shale barren ( <i>Arabis serotina</i> )
T	Birch, Virginia round-leaf ( <i>Betula uber</i> )
E	Bittercress, small-anthered ( <i>Cardamine micranthera</i> )
E	Coneflower, smooth ( <i>Echinacea laevigata</i> )
T	Sneezeweed, Virginia ( <i>Helenium virginicum</i> )
T	Pink, swamp ( <i>Helonias bullata</i> )
E	Mallow, Peter's Mountain ( <i>Ilamna corei</i> )
T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )
T	Orchid, eastern prairie fringed ( <i>Platanthera leucophaea</i> )
E	Harperella ( <i>Ptilimnium nodosum</i> )
E	Sumac, Michaux's ( <i>Rhus michauxii</i> )
E	Bulrush, Northeastern ( <i>Scirpus ancistrochaetus</i> )
T	Spiraea virginia ( <i>Spiraea virginiana</i> )

## West Virginia -- 21 listings

## Animals -- 15

E	Bat, gray ( <i>Myotis grisescens</i> )
E	Bat, Indiana ( <i>Myotis sodalis</i> )
E	Bat, Virginia big-eared ( <i>Corynorhinus</i> (=Plecotus) townsendii virginianus)
E	Blossom, tubercled (pearlymussel) Entire Range; Except where listed as Experimental Populations ( <i>Epioblasma torulosa torulosa</i> )
XN	Blossom, tubercled (pearlymussel) AL; Free-Flowing Reach of the Tennessee River below the Wilson Dam, Colbert and Lauderdale Counties, AL ( <i>Epioblasma torulosa torulosa</i> )

E	Clubshell Entire Range; Except where listed as Experimental Populations ( <i>Pleurobema clava</i> )
T	Eagle, bald (lower 48 States) ( <i>Haliaeetus leucocephalus</i> )
E	Fanshell ( <i>Cyprogenia stegaria</i> )
E	Mucket, pink (pearlymussel) ( <i>Lampsilis abrupta</i> )
E	Puma (=cougar), eastern ( <i>Puma</i> (=Felis) concolor cougar)
E	Riffleshell, northern ( <i>Epioblasma torulosa rangiana</i> )
T	Salamander, Cheat Mountain ( <i>Plethodon nettingi</i> )
T	Snail, flat-spined three-toothed ( <i>Triodopsis platysayoides</i> )
E	Spinymussel, James ( <i>Pleurobema collina</i> )

E	Squirrel, Virginia northern flying ( <i>Glaucomys sabrinus fuscus</i> )	T	Pogonia, small whorled ( <i>Isotria medeoloides</i> )
		E	arperella ( <i>Ptilimnium nodosum</i> )
Plants -- 6		E	Bulrush, Northeastern ( <i>Scirpus ancistrochaetus</i> )
		T	Spiraea, Virginia ( <i>Spiraea virginiana</i> )
E	Rock-cross, shale barren ( <i>Arabis serotina</i> )	E	Clover, running buffalo ( <i>Trifolium stoloniferum</i> )

## Species Proposed or Candidates for Listing under the Endangered Species Act:

## Mammals

Status Species Name

PE	Addax ( <i>Addax nasomaculatus</i> )
PT	Bat, Mariana fruit (=Mariana flying fox) ( <i>Pteropus mariannus mariannus</i> )
PE	Dugong ( <i>Dugong dugon</i> )
PE	Fox, San Miguel Island ( <i>Urocyon littoralis littoralis</i> )
PE	Fox, Santa Catalina Island ( <i>Urocyon littoralis catalinae</i> )
PE	Fox, Santa Cruz Island ( <i>Urocyon littoralis santacruzae</i> )
PE	Fox, Santa Rosa Island ( <i>Urocyon littoralis santarosae</i> )
PE	Gazelle, dama ( <i>Gazella dama</i> )
PE	Oryx, scimitar-horned ( <i>Oryx dammah</i> )
PE	Rabbit, pygmy ( <i>Brachylagus idahoensis</i> )
C	Bat, sheath-tailed ( <i>Emballonura semicaudata</i> )
C	Otter, Northern Sea ( <i>Enhydra lutris kenyonii</i> )
C	Pocket gopher, Mazama ( <i>Thomomys mazama</i> )
C	Prairie dog, black-tailed ( <i>Cynomys ludovicianus</i> )
C	Squirrel, Coachella Valley round-tailed ground ( <i>Spermophilus tereticaudus chlorus</i> )
C	Squirrel, Southern Idaho ground ( <i>Spermophilus brunneus endemicus</i> )
C	Squirrel, Washington ground ( <i>Spermophilus washingtoni</i> )

## Birds

PT	Plover, mountain ( <i>Charadrius montanus</i> )
PE	White-eye, Rota bridled ( <i>Zosterops rotensis</i> )
C	Crake, spotless ( <i>Porzana tabuensis</i> )
C	Creeper, Kauai ( <i>Oreomystis bairdi</i> )
C	Dove, friendly ground ( <i>Gallicolumba stairi</i> )
C	Dove, many-colored fruit ( <i>Ptilinopus perousii perousii</i> )
C	Grouse, Gunnison sage ( <i>Centrocercus minimus</i> )
C	Grouse, western sage ( <i>Centrocercus urophasianus phaios</i> )
C	Horned lark, streaked ( <i>Eremophila alpestris strigata</i> )
C	Prairie-chicken, lesser ( <i>Tympanuchus pallidicinctus</i> )
C	Storm-petrel, band-rumped ( <i>Oceanodroma castro</i> )
C	Warbler, elfin woods ( <i>Dendroica angelae</i> )

## Reptiles

C	Lizard, sand dune ( <i>Sceloporus arenicolus</i> )
C	Massasauga (=rattlesnake), eastern ( <i>Sistrurus catenatus catenatus</i> )
C	Snake, black pine ( <i>Pituophis melanoleucus lodigii</i> )
C	Snake, Louisiana pine ( <i>Pituophis ruthveni</i> )

C	Turtle, Cagle's map ( <i>Graptemys caglei</i> )
C	Turtle, Sonoyta mud ( <i>Kinosternon sonoriense longifemorale</i> )

## Amphibians

C	Frog, Columbia spotted ( <i>Rana luteiventris</i> )
C	Frog, Oregon spotted ( <i>Rana pretiosa</i> )
	Hellbender, Ozark ( <i>Cryptobranchus alleganiensis bishopi</i> )
C	Salamander, Austin blind ( <i>Eurycea waterlooensis</i> )
C	Salamander, Georgetown ( <i>Eurycea naufragia</i> )
C	Salamander, Salado ( <i>Eurycea chisholmensis</i> )
C	Toad, boreal ( <i>Bufo boreas boreas</i> )
C	Waterdog, black warrior (=Sipsey Fork) ( <i>Necturus alabamensis</i> )

## Fishes

PE	Chub, Cowhead Lake tui ( <i>Gila bicolor vaccaceps</i> )
PE	Chub, Gila ( <i>Gila intermedia</i> )
PT	Salmon, coho ( <i>Oncorhynchus</i> (=Salmo) <i>kisutch</i> )
C	Darter, Arkansas ( <i>Etheostoma cragini</i> )
C	Darter, Cumberland johnny ( <i>Etheostoma nigrum susanae</i> )
C	Darter, Pearl ( <i>Percina aurora</i> )
C	Darter, rush ( <i>Etheostoma phytophilum</i> )
C	Grayling, Arctic ( <i>Thymallus arcticus</i> )
C	Madtom, chunky ( <i>Noturus sp.</i> )
C	Sculpin, grotto ( <i>Cottus sp.</i> )
C	Shiner, sharpnose ( <i>Notropis oxyrhynchus</i> )
C	Shiner, smalleye ( <i>Notropis buccula</i> )
C	Sucker, Zuni bluehead ( <i>Catostomus discobolus yarrowi</i> )

## Clams

C	Clubshell, Alabama ( <i>Pleurobema troschelianum</i> )
C	Clubshell, painted ( <i>Pleurobema chattanoogaense</i> )
C	Hornshell, Texas ( <i>Popenatas popei</i> )
C	Kidneyshell, fluted ( <i>Ptychobranhus subientum</i> )
C	Mucket, Neosho ( <i>Lampsilis rafinesqueana</i> )
C	Pearlshell, Alabama ( <i>Margaritifera marrianae</i> )
C	Pearlymussel, slabside ( <i>Lexingtonia dolabelloides</i> )
C	Pigtoe, Georgia ( <i>Pleurobema hanleyanum</i> )
C	Spinymussel, Altamaha ( <i>Elliptio spinosa</i> )

## Snails

PE	Snail, Koster's tryonia ( <i>Tryonia kosteri</i> )
PE	Snail, Pecos assiminea ( <i>Assiminea pecos</i> )
PE	Springsnail, Roswell ( <i>Pyrgulopsis roswellensis</i> )
C	Mountainsnail, Ogden Desert ( <i>Oreohelix peripherica wasatchensis</i> )
C	Pondsnail, Bonneville ( <i>Stagnicola bonnevillensis</i> )
C	Pyrg, elongate mud meadows ( <i>Pyrgulopsis notidicola</i> )

- C Rocksnail, Georgia (*Leptaxis downei*) C Sisi  
(*Ostodes strigatus*)
- C Snail, Diamond Y Spring (*Tryonia adamantina*)
- C Snail, fragile tree (*Samoana fragilis*)
- C Snail, Guam tree (*Partula radiolata*)
- C Snail, Humped tree (*Partula gibba*)
- C Snail, Lanai tree (*Partulina semicarinata*)
- C Snail, Lanai tree (*Partulina variabilis*)
- C Snail, Langford's tree (*Partula langfordi*)
- C Snail, Phantom Lake cave (*Cochliopa texana*)
- C Snail, Tutuila tree (*Eua zebrina*)
- C Springsnail (=Tryonia), Phantom (*Tryonia*  
*cheatumi*)
- C Springsnail, Chupadera (*Pyrgulopsis chupaderae*)
- C Springsnail, Gila (*Pyrgulopsis gila*)
- C Springsnail, Gonzales (*Tryonia circumstriata*  
(=stocktonensis))
- C Springsnail, Huachuca (*Pyrgulopsis thompsoni*)
- C Springsnail, New Mexico (*Pyrgulopsis thermalis*)
- C Springsnail, Page (*Pyrgulopsis morrisoni*)
- C Springsnail, Three Forks (*Pyrgulopsis trivialis*)
- C Tree snail, Newcomb's (*Newcombia cumingi*)

## Insects

- PE Butterfly, Sacramento Mountains checkerspot  
(*Euphydryas anicia cloudcrofti*)
- PE Pomace fly, [unnamed] (*Drosophila aglaia*)
- PE Pomace fly, [unnamed] (*Drosophila differens*)
- PE Pomace fly, [unnamed] (*Drosophila hemipeza*)
- PE Pomace fly, [unnamed] (*Drosophila heteroneura*)
- PE Pomace fly, [unnamed] (*Drosophila*  
*montgomeryi*)
- PE Pomace fly, [unnamed] (*Drosophila mulli*)
- PE Pomace fly, [unnamed] (*Drosophila musaphila*)
- PE Pomace fly, [unnamed] (*Drosophila*  
*neoclavisetae*)
- PE Pomace fly, [unnamed] (*Drosophila obatai*)
- PE Pomace fly, [unnamed] (*Drosophila ochrobasis*)
- PE Pomace fly, [unnamed] (*Drosophila*  
*substenoptera*)
- PE Pomace fly, [unnamed] (*Drosophila*  
*tarphyrichia*)
- C Beetle, Warm Springs Zaitzevian riffle (*Zaitzevia*  
*thermae*)
- C Bug, Wekiu (*Nysius wekiuicola*)
- C Butterfly, Mariana eight-spot (*Hypolimnas*  
*octacula mariannensis*)
- C Butterfly, Mariana wandering (*Vagrans egestina*)
- C Butterfly, whulge checkerspot (=Taylor's)  
(*Euphydryas editha taylori*)
- C Caddisfly, Sequatchie (*Glyphopsyche sequatchie*)
- C Cave beetle, beaver (*Pseudanophthalmus major*)
- C Cave beetle, Clifton (*Pseudanophthalmus caecus*)
- C Cave beetle, greater Adams (*Pseudanophthalmus*  
*pholeter*)
- C Cave Beetle, Holsinger's (*Pseudanophthalmus*  
*holsingeri*)
- C Cave beetle, icebox (*Pseudanophthalmus frigidus*)
- C Cave beetle, inquirer (*Pseudanophthalmus*  
*inquisitor*)
- C Cave beetle, lesser Adams (*Pseudanophthalmus*  
*cataryctos*)
- C Cave beetle, Louisville (*Pseudanophthalmus*  
*troglodytes*)
- C Cave beetle, surprising (*Pseudanophthalmus*  
*inexpectatus*)
- C Cave beetle, Tatum (*Pseudanophthalmus parvus*)
- C Damselfly, blackline Hawaiian (*Megalagrion*  
*nigrohamatum nigrolineatum*)

- C Damselfly, crimson Hawaiian (*Megalagrion*  
*leptodermus*)
- C Damselfly, flying earwig Hawaiian (*Megalagrion*  
*nesiotes*)
- C Damselfly, oceanic Hawaiian (*Megalagrion*  
*oceanicum*)
- C Damselfly, orangeblack Hawaiian (*Megalagrion*  
*xanthomelas*)
- C Damselfly, Pacific Hawaiian (*Megalagrion*  
*pacificum*)
- C Gall fly, Po'olanui (*Phaeogramma sp.*)
- C Pomace fly, [unnamed] (*Drosophila attigua*)
- C Pomace fly, [unnamed] (*Drosophila digressa*)
- C Riffle beetle, Stephan's (*Heterelmis stephani*)
- C Skipper, Dakota (*Hesperia dacotae*)
- C Skipper, Mardon (*Polites mardon*)
- C Tiger beetle, Coral Pink Sand Dunes (*Cicindela*  
*limbata albissima*)
- C Tiger beetle, highlands (*Cicindela highlandensis*)
- C Tiger beetle, Salt Creek (*Cicindela nevadica*  
*lincolniiana*)

## Arachnids

- C Meshweaver, Warton's cave (*Cicurina wartoni*)

## Crustaceans

- PE Amphipod, Noel's (*Gammarus desperatus*)
- C Crayfish, Camp Shelby burrowing (*Fallicambarus*  
*gordoni*)
- C Shrimp, anchialine pool (*Antecaridina lauensis*)
- C Shrimp, anchialine pool (*Callinectes pholidota*)
- C Shrimp, anchialine pool (*Metabetaeus lohena*)
- C Shrimp, anchialine pool (*Palaemonella burnsi*)
- C Shrimp, anchialine pool (*Procaris hawaiiensis*)
- C Shrimp, anchialine pool (*Vetericaris chaceorum*)
- C Shrimp, troglolitic groundwater (*Typhlatya*  
*monae*)

## Flowering Plants

- PE Peppergrass, Slick spot (*Lepidium papilliferum*)
- PE *Nesogenes rotensis* (No common name)
- PE *Osmoxylon mariannense* (No common name)
- PE *Tabernaemontana rotensis* (No common name)
- C Sand-verbena, Ramshaw Meadows (*Abronia*  
*alpina*)
- C Alice-flower, wonderland (*Alicellia caespitosa*)
- C Rockcress, Georgia (*Arabis georgiana*)
- C Silverbrush, Blodgett's (*Argythamnia blodgettii*)
- C Pa'iniu (*Astelia waialealae*) C Aster, Georgia (*Aster georgianus*)
- C Milk-vetch, horseshoe (*Astragalus equisolensis*)
- C Milk-vetch, Sleeping Ute (*Astragalus tortipes*)
- C Ko'oko'olau (*Bidens amplexans*)
- C Ko'oko'olau (*Bidens campylothea pentamera*)
- C Ko'oko'olau (*Bidens campylothea waihoiensis*)
- C Ko'oko'olau (*Bidens conjuncta*)
- C Ko'oko'olau (*Bidens micrantha ctenophylla*)
- C Brickell-bush, Florida (*Brickellia mosieri*)
- C Reedgrass, [unnamed] (*Calamagrostis expansa*)
- C Reedgrass, [unnamed] (*Calamagrostis*  
*hillebrandii*)
- C *Calliandra locoensis* (No common name)
- C Mariposa lily, Siskiyou (*Calochortus persistens*)
- C *Calyptanthus estremerae* (No common name)
- C 'Awikiwiki (*Canavalia napaliensis*)
- C 'Awikiwiki (*Canavalia pubescens*)
- C Paintbrush, Aquarius (*Castilleja aquariensis*)



- C Paintbrush, Christ's (*Castilleja christii*)  
 C Pea, Big Pine partridge (*Chamaecrista lineata keyensis*)  
 C Sandmat, pineland (*Chamaesyce deltoidea pinetorum*)  
 C Spurge, wedge (*Chamaesyce deltoidea serpyllum*)  
 C 'Akoko (*Chamaesyce eleanoriae*)  
 C 'Akoko (*Chamaesyce remyi* var. *kauaiensis*)  
 C 'Akoko (*Chamaesyce remyi* var. *remyi*)  
 C Papala (*Charpentiera densiflora*)  
 C Spineflower, San Fernando Valley (*Chorizanthe parryi* var. *fernandina*)  
 C Thoroughwort, Cape Sable (*Chromolaena frustrata*)  
 C Cactus, Florida semaphore (*Consolea corallicola*)  
 C *Cordia rupicola* (No common name)  
 C Haha (*Cyanea asplenifolia*)  
 C Haha (*Cyanea calycina*)  
 C Haha (*Cyanea eleleensis*)  
 C Haha (*Cyanea kuhihewa*)  
 C Haha (*Cyanea kunthiana*)  
 C Haha (*Cyanea lanceolata*)  
 C Haha (*Cyanea obtusa*)  
 C Haha (*Cyanea tritomantha*)  
 C Ha'iwale (*Cyrtandra filipes*)  
 C Ha'iwale (*Cyrtandra kaulantha*)  
 C Ha'iwale (*Cyrtandra oenobarba*)  
 C Ha'iwale (*Cyrtandra oxybapha*)  
 C Ha'iwale (*Cyrtandra sessilis*)  
 C Prairie-clover, Florida (*Dalea carthagensis floridana*)  
 C Crabgrass, Florida pineland (*Digitaria pauciflora*)  
 C Na'ena'e (*Dubautia imbricata imbricata*)  
 C Na'ena'e (*Dubautia plantaginea magnifolia*)  
 C Na'ena'e (*Dubautia waialealae*)  
 C Cactus, Acuna (*Echinomastus erectocentrus* var. *acunensis*)  
 C Daisy, basalt (*Erigeron basalticus*)  
 C Fleabane, Lemmon (*Erigeron lemmonii*)  
 C Buckwheat, Umtanum Desert (*Eriogonum codium*)  
 C Buckwheat, Red Mountain (*Eriogonum kelloggii*)  
 C *Festuca hawaiiensis* (No common name)  
 C Fescue, Guadalupe (*Festuca ligulata*)  
 C Nanu (*Gardenia remyi*)  
 C Nohoanu (*Geranium hanaense*)  
 C Nohoanu (*Geranium hillebrandii*)  
 C Nohoanu (*Geranium kauaiense*)  
 C *Gonocalyx concolor* (No common name)  
 C Kampua'a (*Hedyotis fluviatilis*)  
 C Sunflower, whorled (*Helianthus verticillatus*)  
 C Rose-mallow, Neches River (*Hibiscus dasycalyx*)  
 C Indigo, Florida (*Indigofera mucronata keyensis*)  
 C Ivesia, Webber (*Ivesia webberi*)  
 C 'Ohe (*Joinvillea ascendens ascendens*)  
 C Hulumoa (*Korthalsella degeneri*)  
 C Kamakahala (*Labordia helleri*)  
 C Kamakahala (*Labordia pumila*)  
 C *Lagenifera erici* (No common name)  
 C *Lagenifera helenae* (No common name)  
 C Gladecress, Texas golden (*Leavenworthia texana*)  
 C Bladderpod, Short's (*Lesquerella globosa*)  
 C Bladderpod, White Bluffs (*Lesquerella tuplashensis*)  
 C Flax, sand (*Linum arenicola*)  
 C Flax, Carter's small-flowered (*Linum carteri carteri*)  
 C Makanoehue (*Lysimachia daphnoides*)  
 C Alani (*Melicope christophersenii*)  
 C Alani (*Melicope degeneri*)  
 C Alani (*Melicope hiiakae*)  
 C Alani (*Melicope makahae*)  
 C Alani (*Melicope paniculata*)  
 C Alani (*Melicope puberula*)  
 C Kolea (*Myrsine fosbergii*)  
 C Kolea (*Myrsine mezii*) C Kolea (*Myrsine vaccinioides*)  
 C Asphodel, bog (*Nartheceum americanum*)  
 C 'Aiea (*Nothocestrum latifolium*)  
 C Holei (*Ochrosia haleakalae*)  
 C Panic grass, Hirsts' (*Panicum hirstii*)  
 C Whitlow-wort, bushy (*Paronychia congesta*)  
 C Cactus, Fickeisen plains (*Pediocactus peeblesianus fickeisemae*)  
 C Beardtongue, Parachute (*Penstemon debilis*)  
 C Beardtongue, Graham (*Penstemon grahamii*)  
 C Beardtongue, White River (*Penstemon scariosus albifluvis*)  
 C 'Ala 'ala wai nui (*Peperomia subpetiolata*)  
 C Phacelia, DeBeque (*Phacelia submutica*)  
 C *Phyllostegia bracteata* (No common name)  
 C *Phyllostegia floribunda* (No common name)  
 C *Phyllostegia hispida* (No common name)  
 C Ho'awa (*Pittosporum napaliense*)  
 C Orchid, white fringeless (*Platanthera integrilabia*)  
 C *Platydesma cornuta cornuta* (No common name)  
 C *Platydesma cornuta decurrens* (No common name)  
 C *Platydesma remyi* (No common name)  
 C Pilo kea lau li'i (*Platydesma rostrata*)  
 C Hala pepe (*Pleomele forbesii*)  
 C Lo'ulu, (=Na'ena'e) (*Pritchardia hardyi*)  
 C 'Ena'ena (*Pseudognaphalium* (=Gnaphalium) *sandwicensium* var. *molokaiense*)  
 C Kopiko (*Psychotria grandiflora*)  
 C Kopiko (*Psychotria hexandra oahuensis*)  
 C Kopiko (*Psychotria hobbayi*)  
 C Kaulu (*Pteralyxia macrocarpa*)  
 C Makou (*Ranunculus hawaiiensis*) C Makou (*Ranunculus mauensis*)  
 C *Schiedea attenuata* (No common name)  
 C Ma'oli'oli (*Schiedea pubescens*)  
 C *Schiedea salicaria* (No common name)  
 C Stonecrop, Red Mountain (*Sedum eastwoodiae*)  
 C 'Anunu (*Sicyos macrophyllus*)  
 C Checkerbloom, Parish's (*Sidalcea hickmanii parishii*)  
 C Popolo (*Solanum nelsonii*)  
 C *Stenogyne cranwelliae* (No common name)  
 C *Stenogyne kealiae* (No common name)  
 C A'e (*Zanthoxylum oahuense*)
- Ferns and Allies**
- C Moonwort, slender (*Botrychium lineare*)  
 C *Cyclosorus boydiae boydiae* (No common name)  
 C *Cyclosorus boydiae kipahuluensis* (No common name)  
 C *Doryopteris takeuchii* (No common name)  
 C *Dryopteris tenebrosa* (No common name)  
 C *Microlepia mauensis* (No common name)  
 C Wawae'iole (*Phlegmariurus stemmermanniae*)



**APPENDIX D**  
**SUMMARY OF SPECIES LISTED AS THREATENED, ENDANGERED, OR SPECIAL STATUS**  
**UNDER STATE LAWS IN STATES INVOLVED IN ORV PROGRAMS**

<b>Number of State Listed Species by Category</b> (Threatened or Endangered Species for which concerns about ORV programs might be raised are identified and shown in Bold)							
State	Mammals	Birds	Reptiles	Amphibians	Fish	Invertebrates	Plants
Alabama	9NG	19NG	14NG	8NG	23NG	70 ISP	0
Florida	20E, 4T, 6SC <b>Florida black bear,</b> <b>Everglades mink, Florida panther</b>	8E, 11T, 17SC	6E, 10T, 7SC	5SC	3E, 2T, 11SC	3E, 4SC	337E, 66T, 10SC
Georgia	7E, 1T, 2R <b>eastern cougar,</b> <b>Florida panther,</b> <b>round-tailed muskrat</b>	7E, 2T, 7R	3E, 7T, 2R, 1U	2T, 5R	16E, 18T, 19R, 2U	14E, 4T	39E, 48T, 12R, 8U
Kentucky	5E, 3T, 6SC	18E, 11T, 16SC, 4HB	3E, 8T, 7SC	2E, 2T, 7SC	28E, 13T, 16SC, 4HB	41E, 45T, 42SC, 20HB	165E, 122T, 67SC, 38HB
Maine	1T	9E, 6T	3E, 2T	0	1T	6E, 6T	88E, 98T, 80PEX, 105SC
Maryland	11E, 1T, 6I <b>eastern cougar</b>	11E, 7T, 7I	7E, 3T, 1I	5E, 1T, 2I	5E, 1T, 2I	34E, 5T, 7I	265E, 77T
Massachusetts	7E, 4SC	12E, 6T, 10SC	8E, 5T, 3SC	2T, 4SC	4E, 2T, 4SC	29E, 24T, 59SC	70E, 32T, 11SC
New Hampshire	2E, 1T <b>Canada lynx,</b> <b>eastern cougar,</b> <b>American marten</b>	12E, 7T	1E, 1T	1	2	6E, 3T	0
New Jersey	9E <b>bobcat</b>	17E, 16T	7E, 3T	5E, 2T	1E	9E, 8T	0
New York	10E, 1T, 3SC	10E, 10T, 19SC	7E, 5T, 6SC	2E, 7SC	8E, 11T, 5SC	16E, 8T, 18SC	0
North Carolina	2T, 11SC	2E, 2T, 16SC	2E, 11SC	1E, 4T, 12SC	7E, 11T, 27SC	18E, 20T, 39SC	91E, 45T, 12SC

<b>Ohio</b>	5E, 8SC bobcat, snowshoe hare, black bear, river otter	19E, 8T, 30SI	5E, 2T	5E, 2T	24E, 13T, 9SC	69E, 23T, 11SI	238E, 153T
<b>Pennsylvania</b>	3E, 3T Delmarva fox squirrel	7E, 7T	3E, 2T	3E, 1T	8E, 10T	2SC	13E, 5T
<b>South Carolina</b>	3E, 1T, 22SC	7E, 2T, 11SC	1E, 3T, 12SC	3E, 1T, 10SC	1E, 1T, 7SC		15E, 6T, 212SC
<b>Tennessee</b>	3E, 1T river otter	4E, 4T	3T	1T	19E, 16T	51E, 4T	0
<b>Vermont</b>	4E, 1T, 3SC Canada lynx, eastern cougar, American marten	8E, 3T, 20SC	2E, 2T, 5SC	1E, 5SC	3E, 2T, 12SC	2E, 6T, 12SC	61E, 92T
<b>Virginia</b>	11E, 1T	4E, 8T, 26SC	4E, 3T, 1SC	2E, 2T, 8SC	7E, 12T, 16SC	36E, 12T, 14SC, 3PE, 3PT	15E, 1T
<b>West Virginia</b>	20SC	22SC	17SC	12SC	34SC	0	0

C=candidate species for listing as threatened or endangered

NG=Nongame Species Regulation;

ISP=Invertebrate Species Regulation

SC=Species of Concern or Special Concern

SI= "Special Interest" Species

PEX=Possibly Extirpated

E=State Endangered

T=State Threatened

HB=Historical Biota

R=Rare

U=Unusual

PE=Proposed Endangered

PT=Proposed Threatened

I=In Need of Conservation

<b>State</b>	<b>T&amp;E Protections under State Law</b>
<b>Alabama</b>	no state threatened or endangered status; certain listed "nongame" species given special protection against "take"; "take" not specifically defined.
<b>Florida</b>	unlawful to "capture" endangered or to "take" threatened species without permit.
<b>Georgia</b>	species are listed as endangered, threatened, rare or unusual and are given this status under the Georgia Endangered wildlife Act of 1973.
<b>Kentucky</b>	state laws defines "take" for state listed endangered species similar to ESA; state threatened, species of concern and historical biota have no special additional protection.
<b>Maine</b>	unlawful to "hunt, take or trap" any endangered or threatened species without a permit issued for specific action by the commissioner or the state of Maine.
<b>Maryland</b>	state law defines "take" similar to ESA; endangered and threatened categories have protections against "take".

<b>Massachusetts</b>	"take" defined similar to ESA; threatened, endangered, and "special concern" categories have equal protections against "take".
<b>New Hampshire</b>	unlawful for any person to take, possess, transport or sell wildlife deemed by the executive director to be in need of conservation pursuant to this section
<b>New Jersey</b>	unlawful to "take" any endangered species of fish or wildlife; "take" defined similar to ESA; no exemptions or permits to allow for incidental take.
<b>New York</b>	endangered and threatened categories have protections against "take"; "special concern" category has no special additional protection.
<b>North Carolina</b>	"Take" includes all operations during, immediately preparatory and immediately subsequent to an attempt, whether successful or not, to capture, kill, pursue, hunt or otherwise harm or reduce to possession any fisheries resources or wildlife resources. It is unlawful to "take" any endangered or threatened species of fish or wildlife.
<b>Ohio</b>	unlawful to "take" any endangered species of fish or wildlife; "take" not specifically defined; no exemptions or permits to allow for incidental take; no special protections for "threatened" or "special interest" species; APHIS-WS advised to just release any state listed species if captured or to report accidental mortality.
<b>Pennsylvania</b>	endangered and threatened categories have protections against "take."
<b>South Carolina</b>	unlawful to "take" endangered and threatened species. "Take" means "to harass, hunt, capture, kill or attempt to harass, hunt, capture or kill."
<b>Tennessee</b>	unlawful to take, possess, transport, export or ship any endangered or threatened species without permit; regulations allow provisions for "take" to alleviate damage and to protect human health and safety.
<b>Vermont</b>	unlawful to "take" any endangered or threatened species without the issuance of a permit; "take" not specifically defined; state law includes all federally listed species as state listed.
<b>Virginia</b>	unlawful to "take" any endangered or threatened species of fish or wildlife; "take" defined same as federal ESA; no exemptions or permits to allow for incidental take.
<b>West Virginia</b>	only lists federal T&E species as having protections; "Species of Concern" are listed, but have no legal status other than those that are already federally listed.

**APPENDIX E**  
**ECOREGION DESIGNATIONS WITHIN STATES INVOLVED IN ORV PROGRAMS**

Ecoregions are ecosystems of regional extent as defined by Bailey (1995). An "X" means the state contains the ecosystem/ecoregion described in the key below. The reader is referred to Bailey (1995) for more detailed descriptions of each ecoregion and the climate, soils, vegetation, and animal life that occur there.

State	Ecoregion Designation Number (Bailey 1995) (See Key Below)								
	212	M212	221	222	M221	231	232	234	411
Maine	X	X	X						
New Hampshire		X	X						
Vermont	X	X							
Massachusetts		X	X						
New York	X	X	X	X					
Pennsylvania	X		X		X				
Ohio			X	X	X				
New Jersey			X						
Maryland			X			X	X		
West Virginia			X		X				
Virginia					X	X	X		
Kentucky			X	X	X			X	
Tennessee			X	X	X	X		X	
North Carolina		X	X			X	X		
South Carolina						X	X		
Georgia		X	X			X	X		
Alabama						X	X		
Florida							X		X

Key to Ecoregion Designations (adapted from descriptions by Bailey 1995):

Numbers in the 200 series are within the "Humid Temperate Domain":

- 212     Laurentian Mixed Forest Province -- lower elevation areas (sea level to 2,400 ft.), flat to rolling hills in relief, moderately long and severe winters; native vegetation types are transitional between spruce-fir coniferous boreal forest and broadleaf deciduous forest zones and are characterized by mixed stands of coniferous (mainly pine) species and a few deciduous species (mainly yellow birch, sugar maple, and American beech); in some areas, other tree species include hemlock, red cedar.
- M212     Adirondack-New England Mixed Forest-Coniferous Forest-Alpine Meadow Province -- mountainous region with elevations between 500 and 4000 ft.; warm summers and sometimes cold winters; native vegetation types transitional between boreal spruce-fir coniferous forest to the north and deciduous forest to the south; valleys contain hardwood forest (sugar maple, yellow birch, beech, hemlock), lower mountain slopes with mixed forest of spruce, fir, maple, beech, and birch, and higher elevations with fir and spruce.

- 221 Eastern Broadleaf Forest (Oceanic) Province – diverse topography; elevations from 1000 to 3000 ft.; cold winters and warm summers; native vegetation characterized by temperate deciduous forest dominated by tall broadleaf trees that provide a dense, continuous canopy in summer and shed their leaves in winter; dominant deciduous species include American beech, yellow-poplar, basswoods, sugar maple, buckeye, red oak, white oak, hemlock; includes areas of pine-oak forest (“Pine Barrens”).
- 222 Eastern Broadleaf Forest (Continental) Province – flat to rolling to moderate in relief; elevations from 80 to 1,650 ft.; hot summers; native vegetation dominated by broadleaf deciduous forest with oak and hickory tree species more abundant than in other provinces; gradually turns more to prairie towards the Midwest, forming a mosaic pattern with prairie.
- M221 Central Appalachian Broadleaf Forest - Coniferous Forest - Meadow Province – low mountains at elevations ranging from 300 to 6,700 ft.; distinct summers and winters; native vegetation characterized by mixed oak-pine forest, dominated by the white and black oak groups at lower levels; northeastern hardwood forest at mid elevation levels, and spruce-fir forest and meadows on the highest peaks.
- 231 Southeastern Mixed Forest Province – comprised of the Piedmont and irregular Gulf Coastal Plains with elevations from 100 to 1000 feet and flat to gentle sloping relief; mild winters, hot humid summers; native vegetation comprised of broadleaf deciduous (oak, hickory, sweetgum, red maple, winged elm) and needleleaf evergreen trees (mostly loblolly pine, shortleaf pine, other southern yellow pine species).
- 232 Outer Coastal Plain Mixed Forest Province – flat and irregular Atlantic and Gulf Coastal Plains areas; flat to gentle sloping to gentle rolling in relief; temperatures relatively steady across seasons; native vegetation comprised of temperate rainforest characterized by evergreen oaks and members of the laurel and magnolia families, with coastal marshes and interior swamps dominated by gum and cypress tree species; most upland areas covered by subclimax pine forest.
- 234 Lower Mississippi Riverine Forest Province – flat to gently sloping broad floodplain and low terraces made up of alluvium and loess; from near sea level in the south, altitude increases gradually to about 660 feet in the north; land of oxbow lakes and swamps are significant in the extreme southern portion of the province; warm winters and hot summers; rain falls throughout the year, with a minimum in autumn; temperature and precipitation decrease heading north; native vegetation comprised of bottom-land deciduous forest, with ash, elm, cottonwood, sugarberry, sweetgum, water tupelo, oak, bald cypress, and vines significant along water courses.

Numbers in the 400 series are within the “Humid Tropical Domain”:

- 411 Everglades Province – extensive low elevation (sea level to about 25 ft.) areas consisting primarily of large areas of swamps and marshes; hot summers and warm winters; native vegetation consists of tropical moist hardwood forest dominated by cypress trees and mangroves along the eastern and southern coasts; much open marsh characterized by grasses, reeds, sedges, and other aquatic herbaceous plants; some areas with dense stands of sawgrass and three-awn grasses.





**APPENDIX F**  
**AMERICAN INDIAN TRIBES LOCATED IN STATES INVOLVED IN ORV PROGRAMS**

**FEDERALLY RECOGNIZED TRIBES**

Aroostook Band of Micmac Indians of Maine	Mohegan Indian Tribe of Connecticut	Poarch Band of Creek Indians of Alabama
Catawba Indian Nation (aka Catawba Tribe of South Carolina)	Narragansett Indian Tribe of Rhode Island	Seminole Tribe of Florida, Dania, Big Cypress & Brighton Reservations
Cayuga Nation of New York	Oneida Nation of New York	Seneca Nation of New York
Eastern Band of Cherokee Indians of North Carolina	Onondaga Nation of New York	St. Regis Band of Mohawk Indians of New York
Houlton Band of Maliseet Indians of Maine	Passamaquoddy Indian Township of Maine	Tonawanda Band of Seneca Indians of New York
Mashantucket Pequot Tribe of Connecticut	Penobscot Tribe of Maine	Tuscarora Nation of New York
Micosukee Tribe of Indians of Florida	Pleasant Point-Passamaquoddy of Maine	Wampanoag Tribe of Gay Head (Aquinnah) of Massachusetts

**STATE RECOGNIZED TRIBES**

Cherokees of SE Alabama	Mattiponi Indian Nation	Schaghticoke Indian Tribe
Cherokee Tribe of Northeast	Monacan Indian Tribe	Shinnecock Tribe
Chickahominy Tribe	Nansemond Indian Tribal Association	Star Clan of Muskogee Creeks of Pike County
Eastern Chickahominy	Nanticoke Lenni-Lenape	United Rappahannock Tribe
Echota Cherokee of Alabama	Oklevuaha Band of Yamassee	United Remnant Band Shawnee Nation
Haliwa-Saponi Tribe, Inc.	Seminole	Unkechaug Indian Nation of Poospatuck Indians
Hassanamisco Nipmuc Tribe	Pamunkey Nation	Upper Mataponi Tribe
Langley Band of Chickamogee	Paucatuck Eastern Pequot	Waccamaw-Siouan Development
Cherokee Indians	Powhatan Renape Nation	Coharie Intra-Tribal Council
Lumbee Regional Development	Ramapough Mountain Indians	
Machis Lower Creek Indian	Meherrin Indian Tribe	



**APPENDIX G**  
**USDA-AGRICULTURAL MARKETING SERVICE-NATIONAL ORGANICS PROGRAM RULE**  
**ON ORV BAIT DISTRIBUTION ON ORGANIC FARMS**



United States  
Department of  
Agriculture

Agricultural  
Marketing  
Service

STOP 0268 - Room 4008-S  
1400 Independence Avenue, SW.  
Washington, D.C. 20250-0200

April 15, 2003

Ms. Wendy Servoss  
Environmental Coordinator  
USDA-APHIS-WS  
6213-E Angus Drive  
Raleigh, North Carolina 27617

Dear Ms. Servoss:

This is in response to your request that the National Organic Program (NOP) rule on whether the U.S. Department of Agriculture's (USDA), Animal and Plant Health Inspection Service, Wildlife Services (APHIS-WS) Oral Rabies Vaccination (ORV) Program will have an adverse affect on organic crop and livestock operations.

We understand the ORV Program to be an emergency disease treatment for the control of rabies. As such the program is addressed under NOP section 205.672, Emergency pest or disease treatment. We further understand that APHIS-WS will typically hand bait in highly populated urban areas and will typically acrially distribute the baits in other areas at the rate of approximately 75 baits per square kilometer.

We have determined that the placement of ORV bait blocks, consisting of a genetically engineered vaccine imbedded in fishmeal bound by a polymer binding agent, on an organic operation will not have an adverse impact on that organic operation. This determination is applicable to ground and aerial distribution of ORV baits. The basis of this determination is that the vaccine is not expected to contact organic crops or to be consumed by organic livestock.

In the unlikely event that a bait block breaks and exposes a plant(s) to the vaccine, the organic producer can remove the affected plant(s) with no adverse effect on the operation's certification. This would comply with section 205.672(a). The organic status of animals feeding on the ORV bait block and not penetrating the vaccine will not be adversely affected. In the unlikely event that an animal consumes the vaccine within the ORV bait block that animal will lose organic status as provided in NOP section 205.672(b).

After reviewing documents provided by APHIS-WS, we believe there is little chance that an organic animal will consume the vaccine within an ORV bait block regardless of whether the baits are hand or acrially distributed. To further reduce the chances of livestock consumption, baits

Ms. Wendy Servoss  
Page 2

distributed by hand should be placed outside of areas containing livestock. When baits are aerially distributed livestock producers can reduce the chances of livestock consumption by relocating any bait found within an area containing livestock to a point outside of that area.

Thank you for your interest in the NOP. If we can be of further assistance we can be reached at 202-720-3252.

Sincerely,

A handwritten signature in dark ink, appearing to read "Richard H. Mathews", with a long horizontal flourish extending to the right.

Richard H. Mathews  
Program Manager  
National Organic Program

**APPENDIX H  
NATIONAL FOREST SYSTEM (NFS) LANDS AND ACREAGE<sup>1</sup>  
APPROXIMATE ORAL RABIES VACCINATION BAITING SCHEDULE  
AND  
MAPS OF FORESTS**

**1. NATIONAL FOREST SYSTEM LANDS WITHIN PLANNED ORV BARRIER ZONES<sup>1</sup>**

**\*important to bait these areas to stop the western movement of the epizootic into states that currently do not have the raccoon strain of the rabies virus**

**• FOREST SERVICE REGION 8 – SOUTHERN REGION**

- **VA:** Jefferson National Forest (720,552 NFS acres) - current ORV barrier is within 241.56 square miles of this area

**• FOREST SERVICE REGION 9 – EASTERN REGION**

- **NH:** White Mountain National Forest, White Mountain National Forest Purchase Unit (746,581 NFS acres; 34,251 NFS acres, respectively). Cornell University initiates baiting in these areas – National Forest areas located below 500 meters near towns of Stark and Northumberland are within current ORV barrier.
- **OH:** Wayne National Forest (232,610 NFS acres) – current ORV barrier is within 16.45 square miles of this area
- **WV:** Monongahela National Forest (897,892 NFS acres) – current ORV barrier is within 146.70 square miles of this area

**2. NATIONAL FOREST SYSTEM LANDS OUTSIDE CURRENT ORV BARRIER ZONES**

**• FOREST SERVICE REGION 8 – SOUTHERN REGION**

○ **AL**

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 3 TO 5 YEARS**

Talladega National Forest (389,831 NFS acres)

Tuskegee National Forest (11,252 NFS acres)

Conecuh National Forest (83,858 NFS acres)

○ **FL**

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 5 TO 7 YEARS**

Ocala National Forest (383,584 NFS acres)

○ **GA**

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 5 TO 7 YEARS**

Chattahoochee National Forest (748,372 NFS acres)

Ed Jenkins National Recreation Area (23,166 NFS acres)

○ **KY**

**BARRIER NOT PLANNED IN KY UNLESS CURRENT BARRIER FAILS**

Jefferson National Forest (720,552 NFS acres)

○ **NC**

<sup>1</sup> Although entire National Forest System acreage is listed, only portions of each National Forest may be baited, depending on the needs of the program over time.

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 5 TO 7 YEARS**

Pisgah National Forest (506,785 NFS acres)

Nantahala National Forest (530,202 NFS acres)

- **SC**

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 5 TO 7 YEARS**

Sumter National Forest (364,598 NFS acres)

- **TN**

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 5 TO 7 YEARS**

Cherokee National Forest (636,125 NFS acres)

- **VA**

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 5 TO 7 YEARS**

George Washington National Forest (1,065,232 NFS acres)

Mount Rogers National Recreation Area (118,509 NFS acres)

- **FOREST SERVICE REGION 9 – EASTERN REGION**

- **ME**

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 5 TO 7 YEARS**

White Mountain National Forest (746,581 NFS acres)

White Mountain National Forest Purchase Unit (34,251 NFS acres)

- **MA**

~~APHIS-WS DOES NOT INITIATE BAITING IN THIS STATE~~

- **NH**

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 10+ YEARS**

Other Portions of White Mountain National Forest (746,581 NFS acres)

- **OH**

**THIS SITE WILL NOT BE BAITED, OUTSIDE CURRENT/PLANNED ORV ZONES**

Wayne National Forest Purchase Unit (1,027 NFS acres)

- **PA**

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 1 TO 4 YEARS**

Allegheny National Forest (513,139 NFS acres) - will bait 150.36 square miles on western edge of forest

Allegheny National Recreation Area (23,063 NFS acres)

- **VT**

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 10+ YEARS**

Green Mountain National Forest (384,196 NFS acres)

- **WV**

**BEST ESTIMATE FOR INCLUDING THESE SITES IN ORV ZONE IS 5 TO 7 YEARS**

George Washington National Forest (1,065,232 NFS acres)

Jefferson National Forest (720,552 NFS acres)

Monongahela National Forest Purchase Unit (5,986 NFS acres)

Spruce Knob-Seneca Rock National Recreation Area (57,237 NFS acres)

**3. NATIONAL FOREST SYSTEM LANDS EXCLUDED FROM ORV PROGRAM****• WILDERNESS AREAS IN FOREST SERVICE REGION 8 – SOUTHERN REGION****○ AL**

Talladega National Forest

- Cheaha (7,245 NFS acres)
- Dugger Mountain (9,200 NFS acres)

**○ FL**

Ocala National Forest

- Alexander Springs (7,941 NFS acres)
- Billies Bay (3,092 NFS acres)
- Juniper Prairie (14,277 NFS acres)
- Little Lake George (2,833 NFS acres)

**○ GA**

Chattahoochee National Forest

- Big Frog (89 NFS acres)
- Blood Mountain (7,800 NFS acres)
- Brasstown (12,896 NFS acres)
- Cohutta (35,268 NFS acres)
- Ellicott Rock (2,021 NFS acres)
- Mark Trail (16,400 NFS acres)
- Raven Cliffs (9,115 NFS acres)
- Rich Mountain (9,476 NFS acres)
- Southern Nantahala (11,770 NFS acres)
- Tray Mountain (9,702 NFS acres)

**○ NC**

Nantahala National Forest

- Ellicott Rock (3,394 NFS acres)
- Joyce Kilmer-Slickrock (13,562 NFS acres)
- Southern Nantahala (11,703 NFS acres)

Pisgah National Forest

- Linville Gorge (11,786 NFS acres)
- Middle Prong (7,460 NFS acres)
- Shining Rock (18,483 NFS acres)

**• WILDERNESS AREAS IN FOREST SERVICE REGION 9 – EASTERN REGION****○ ME**

White Mountain National Forest

- Caribou-Speckled Mountain (12,000 NFS acres)

**○ NH**

White Mountain National Forest

- Great Gulf (5,552 NFS acres)
- Pemigewasset (45,000 NFS acres)

- Presidential Range-Dry River (27,380 NFS acres)
- Sandwich Range (25,000 NFS acres)
- PA
  - Allegheny National Forest
    - Allegheny Islands (368 NFS acres)
    - Hickory Creek (8,663 NFS acres)
- SC
  - Sumter National Forest
    - Ellicott Rock (2,859 NFS acres)
- TN
  - Cherokee National Forest
    - Bald River Gorge (3,721 NFS acres)
    - Big Frog (7,993 NFS acres)
    - Big Laurel Branch (6,332 NFS acres)
    - Citico Creek (16,226 NFS acres)
    - Cohutta (1,709 NFS acres)
    - Gee Creek (2,493 NFS acres)
    - Joyce Kilmer-Slickrock (3,832 NFS acres)
    - Little Frog Mountain (4,666 NFS acres)
    - Pond Mountain (6,890 NFS acres)
    - Sampson Mountain (7,991 NFS acres)
    - Unaka Mountain (4,496 NFS acres)
- VT
  - Green Mountain National Forest
    - Big Branch (6,720 NFS acres)
    - Breadloaf (21,480 NFS acres)
    - Bristol Cliffs (3,738 NFS acres)
    - George D. Aiken (5,060 NFS acres)
    - Lye Brook (15,503 NFS acres)
    - Peru Peak (6,920 NFS acres)
- VA
  - George Washington National Forest
    - Barbours Creek (4 NFS acres)
    - Priest (5,963 NFS acres)
    - Ramseys Draft (6,518 NFS acres)
    - Rich Hole (6,450 NFS acres)
    - Rough Mountain (9,300 NFS acres)
    - Saint Mary's (9,835 NFS acres)
    - Shawvers Run (101 NFS acres)
    - Three Ridges (4,608 NFS acres)
  - Jefferson National Forest
    - Barbours Creek (5,378 NFS acres)
    - Beartown (5,609 NFS acres)
    - James River Face (8,886 NFS acres)
    - Kimberling Creek (5,542 NFS acres)
    - Lewis Fork (5,618 NFS acres)
    - Little Dry Run (2,858 NFS acres)
    - Little Wilson Creek (3,613 NFS acres)



- Mountain Lake (8,314 NFS acres)
- Peters Mountain (3,328 NFS acres)
- Shawvers Run (3,366 NFS acres)
- Thunder Ridge (2,344 NFS acres)
- WV
  - Monongahela National Forest
    - Cranberry (35,864 NFS acres)
    - Dolly Sods (10,215 NFS acres)
    - Laurel Fork North (6,055 NFS acres)
    - Laurel Fork South (5,997 NFS acres)
    - Otter Creek (20,000 NFS acres)
  - Jefferson National Forest
    - Mountain Lake (2,721 NFS acres)

## NATIONAL FOREST MAPS

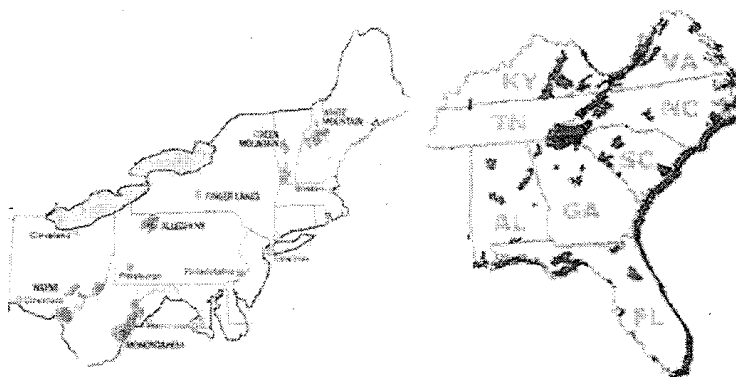
### GENERAL

The USFS manages the 191 million acres of the National Forest System in a sustainable manner in collaboration with the American public; interested organizations; private landowners; State, local and tribal governments; federal agencies; and others.

Through the Organic Administration Act of June 4, 1897, (chapter 2, 30 Stat. 34-36) Congress authorized the creation of what is now the National Forest System "to improve and protect" federal forests. To carry out this mission, the USFS has authority "to regulate [the Forests'] occupancy and use and to preserve the forests therein from destruction" (16 U.S.C. 551). The Multiple-Use Sustained-Yield Act of 1960 confirms USFS authority to manage the national forests and grasslands "for outdoor recreation, range, timber, watershed, and wildlife and fish purposes," (16 U.S.C. § 528).

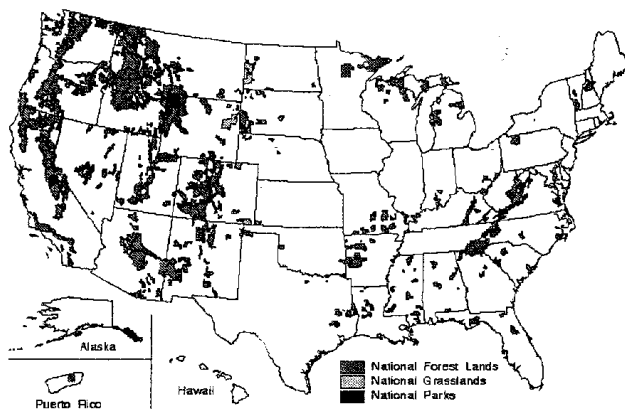
Please see the USFS website, <http://www.fs.fed.us/>, for detailed descriptions of each National Forest listed in this appendix.

### FOREST SERVICE SYSTEM LANDS WITHIN POTENTIAL ORAL RABIES VACCINATION (ORV) ZONES



Portion of USFS Region 9 within ORV Zone

Portion of USFS Region 8 within ORV Zone



Map of U.S. including National Forest System Lands



